



# **ARNOLD ENGINEERING**

**1551 East Orangethorpe Avenue,  
Fullerton, CA**


ARNOLD ENGINEERING  
1551 E. ORANGETHORPE AVE.


**Legend**


 Litigation Sites

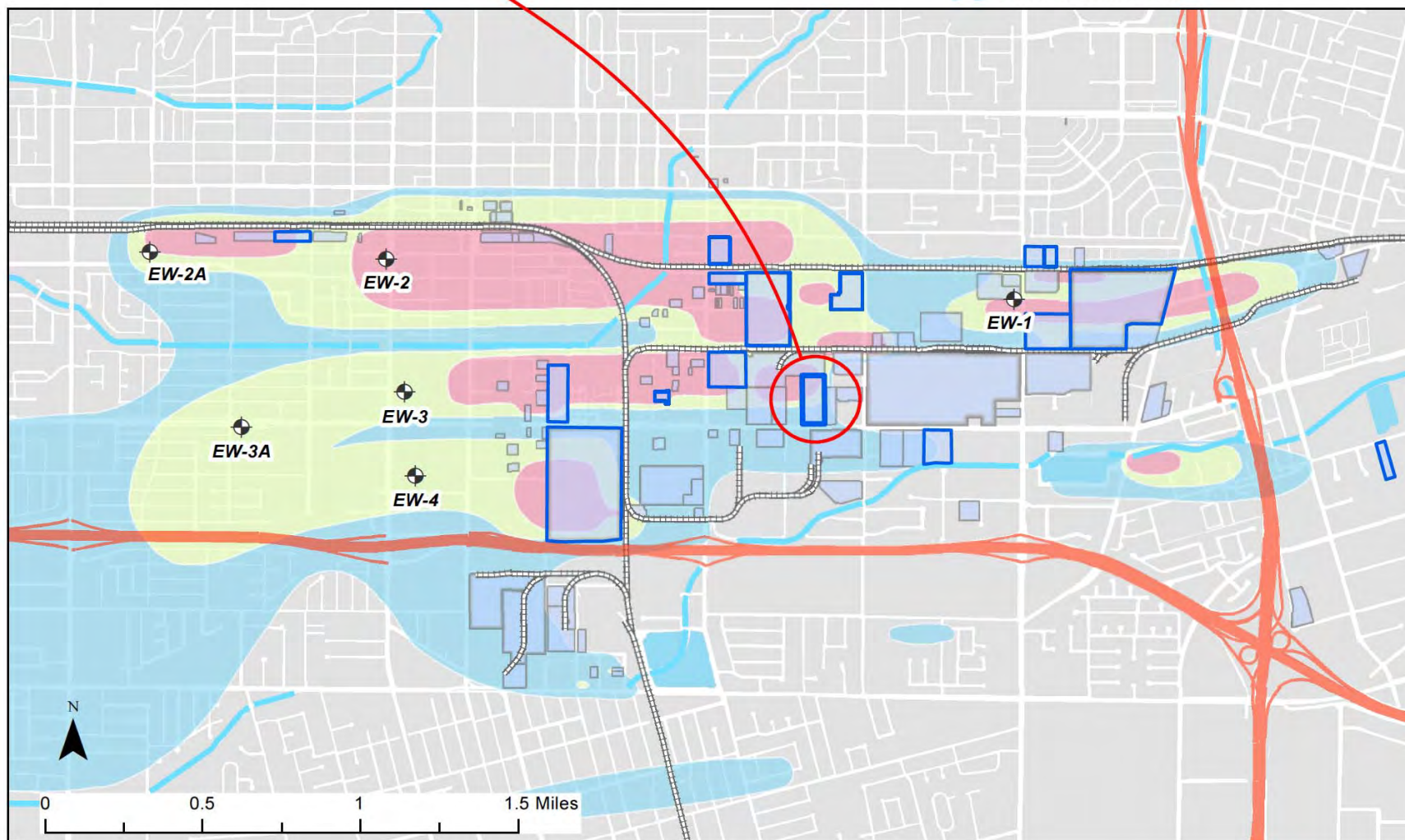
 Extraction Wells

**Composite Plume Outline (2008)**

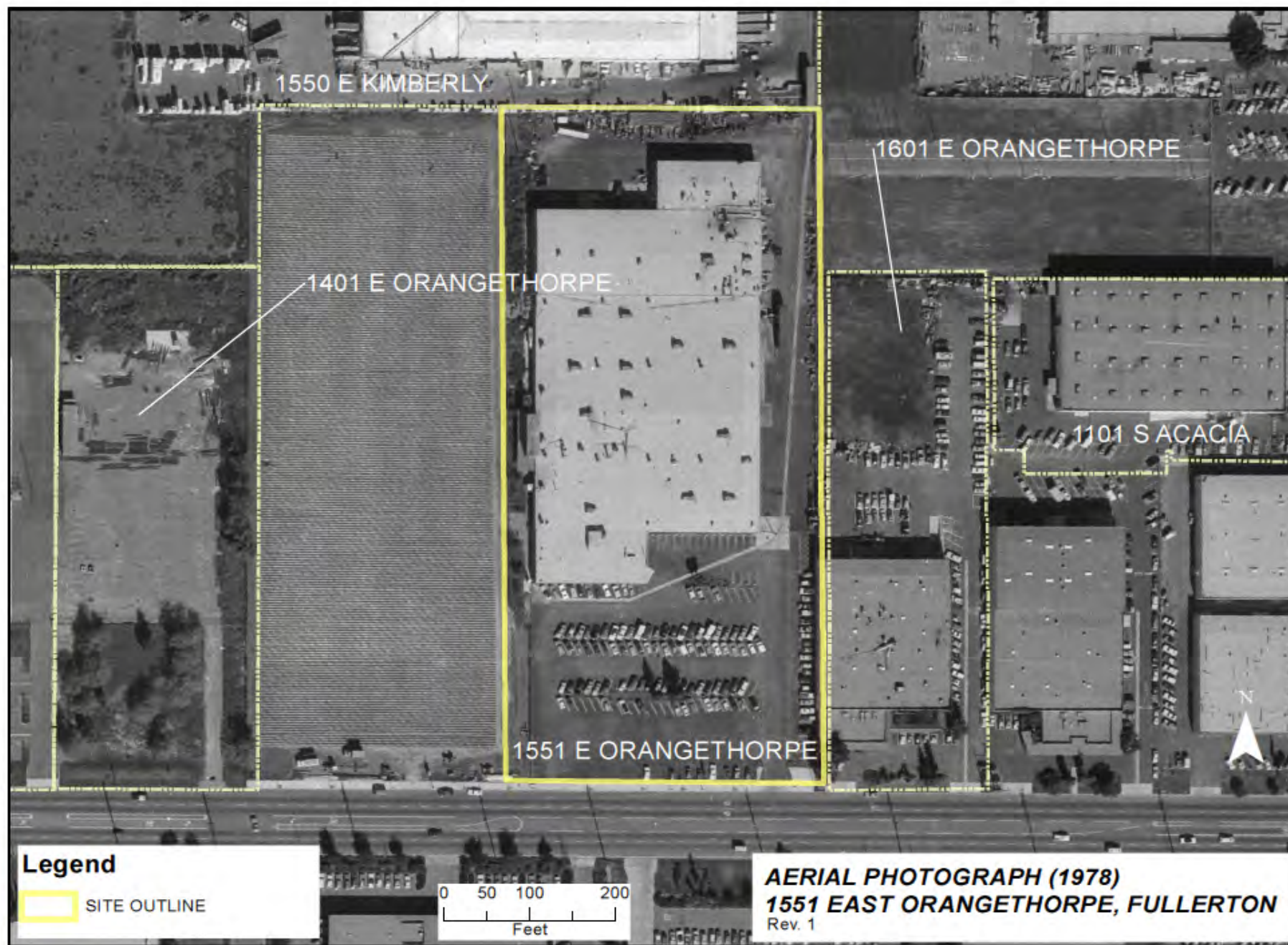
 VOCs > 10X MCL

 VOCs > 5X MCL to 10X MCL

 VOCs > MCL to 5X MCL







# Site History

- Pre-1956 – Undeveloped
- 1956 to 1960 – Ensign Carburetor reportedly operated a carburetor repair and rebuilding operation
- 1960 to 1988 – Arnold Engineering/Integrated Specialties performed etching of metals for the electronics industry
- Between October 1973 and 1974 – Extension of north side of building had been constructed



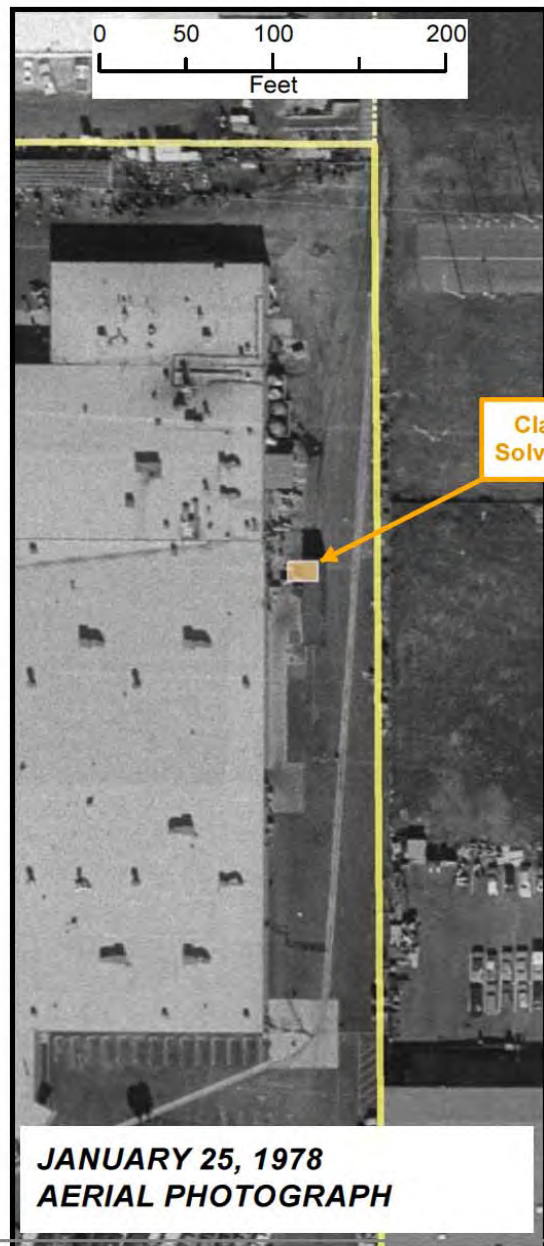
March 1959



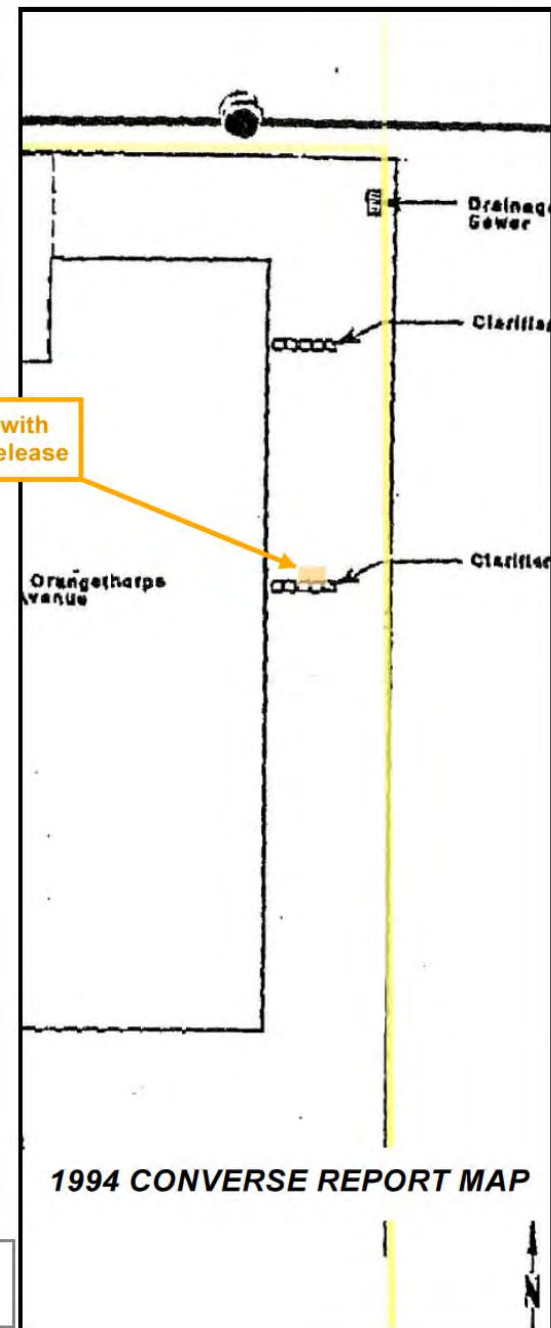
December 1978

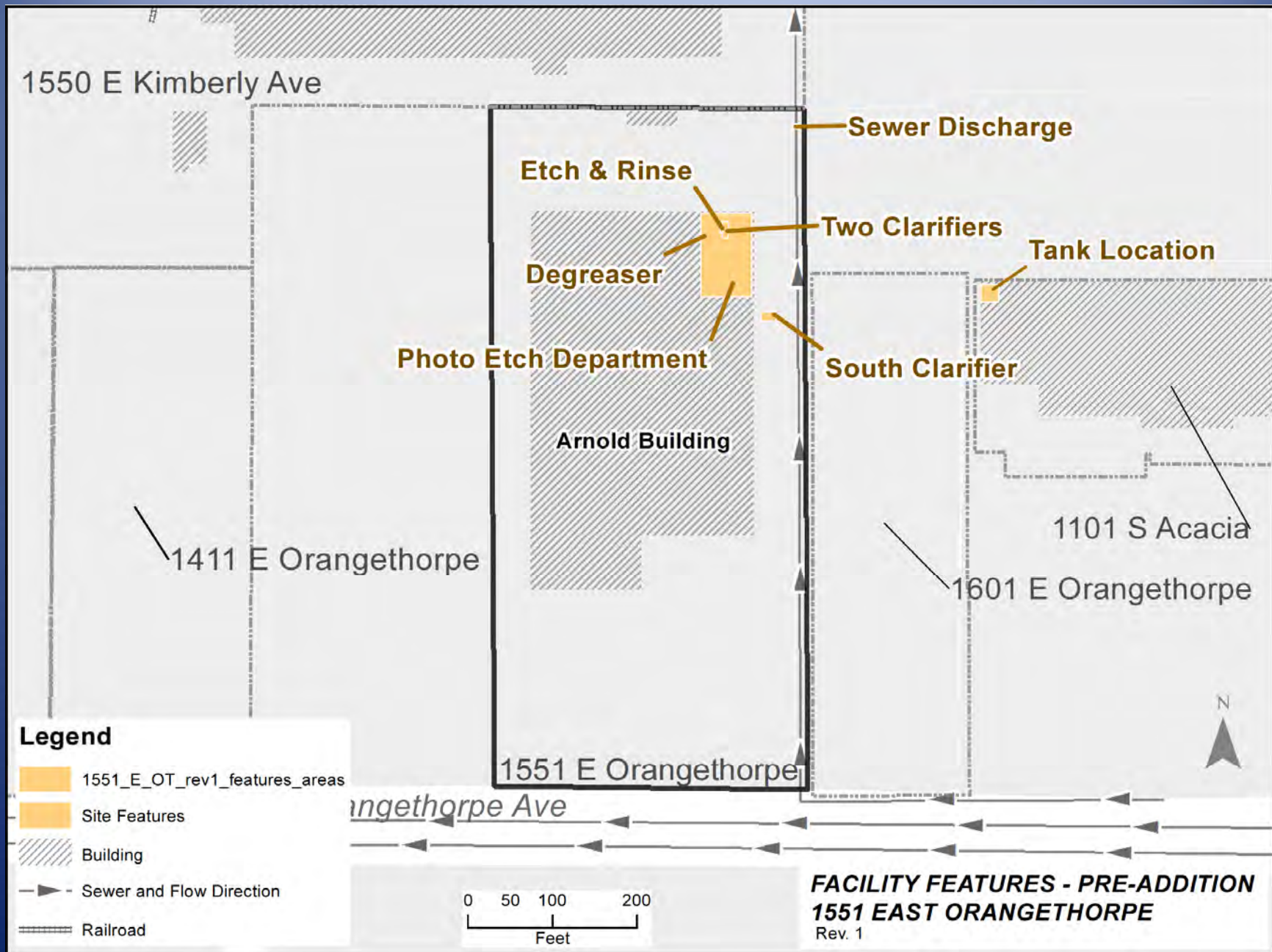




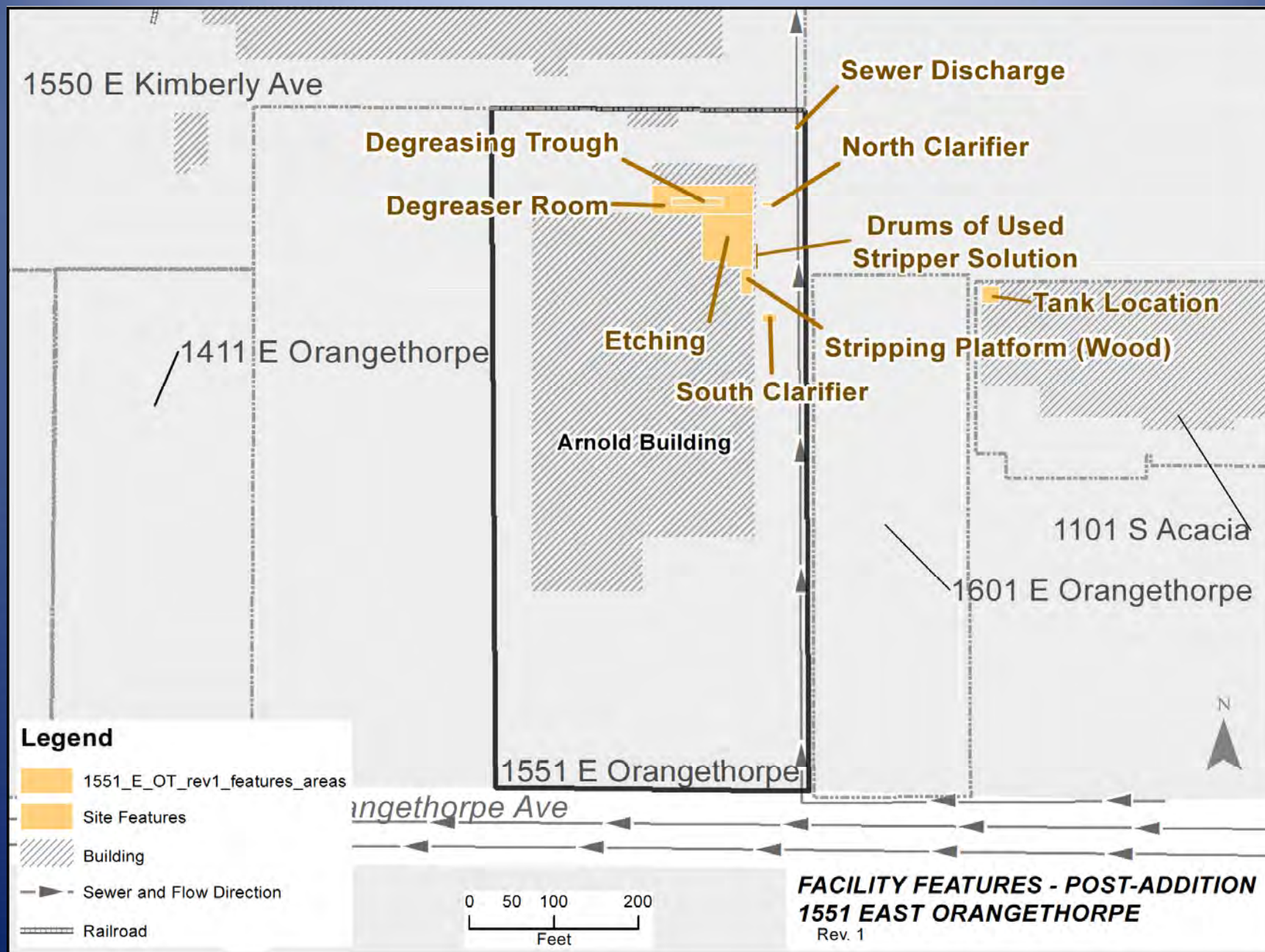


**Figure 2.2-1. Locations of clarifiers**



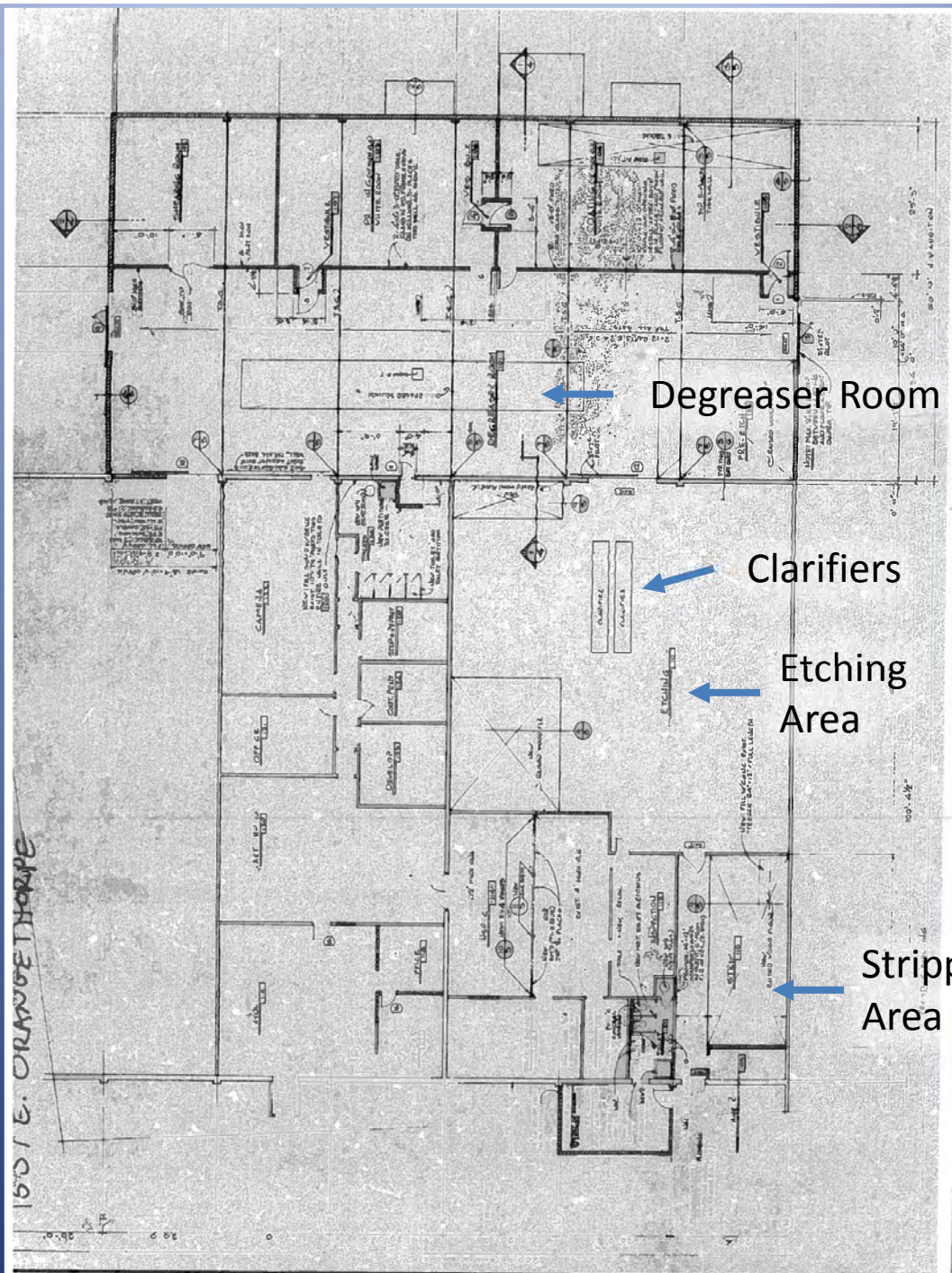






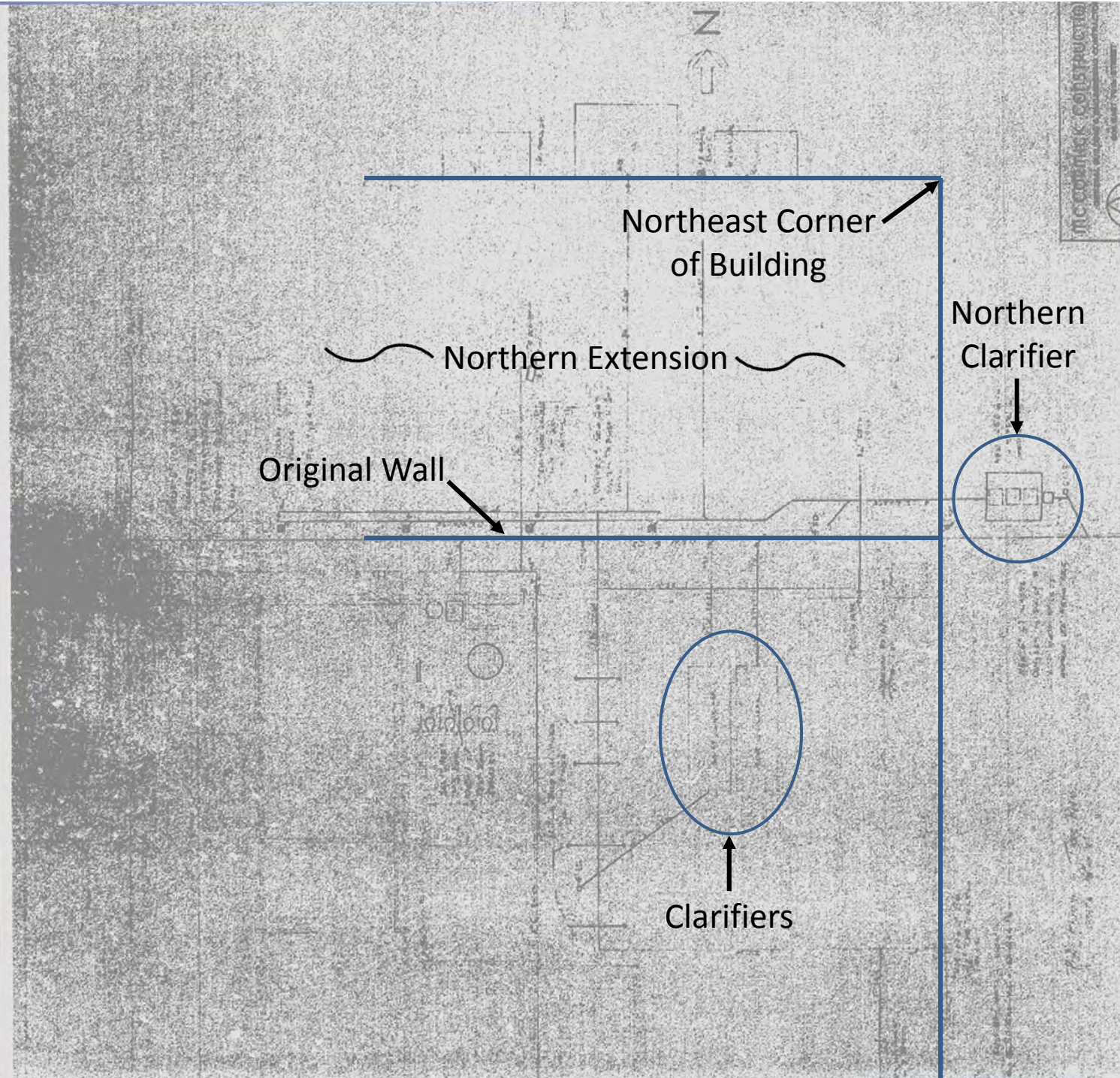


**Exhibit  
747**





**Exhibit  
748**



# Site History

- 1985 – Reported release of sludge containing iron, nickel, and copper
- 1989 to 1992 – Eye Encounter (parent company of Woodmill Products) occupied site
- 1989 to 1995 – Johnson Controls stored battery casings at the site



# Site History

- 1990 to at least 1992 – James Gile & Co Inc. and Woodmill Products occupied the site; Woodmill reportedly manufactured picture frames and performed silk screening operations
- 1992 – Marion Mfg, Inc. operated at site
- 1992 to 1993 – Princess Frames operated at site

# Site History

- 1992 – Site Assessment on behalf of Red Eagle Properties identified two below-ground clarifiers
- 1994 – Red Eagle Properties removed the two clarifiers (both partially filled with liquid – capacity estimated at 2,000 gallons of liquid each); single soil sample from southern clarifier pit contained significant levels of PCE (27,000 ppb) and Total Recoverable Petroleum Hydrocarbons (TRPH)



# Site History

- 1994 to 1995 – Additional soil sampling in vicinity of southern clarifier revealed high levels of PCE, TCE, and 1,1-DCE in soil to 105 feet bgs; no groundwater samples collected
- 1995 – Two SVE wells installed at southern clarifier were operated for 3 months; confirmation soil samples showed high remaining concentrations of PCE, TCE, and 1,1,1,-TCA

# Site History

- December 1995 – RWQCB determined Red Eagle Properties was not responsible for site contamination
- 1995 to present – Elden Collections/Country Affaire, Inc. leases site, manufactures wooden furniture
- 2006 – Groundwater samples in wells from Johnson Controls site immediately downgradient of Arnold Engineering contained high concentrations of TCE, 1,1-DCE, and 1,4-dioxane



# Site History

- 2007 – Vapor survey indicates multiple sources of PCE, TCE, 1,1,1-TCA, and 1,1-DCE within and near the building:
  - Southern clarifier area
  - Eastern side of building (etching area)
  - Northern addition (metal cleaning and coating area)
  - Northern drum storage area
  - Northern property boundary

# Site History

- 2007 – Six SVE wells and four passive wells installed
- 2008 – Remediation system operated for 11 months, removing 49.5 lbs of PCE and 6.6 lbs of TCE; concentrations in confirmation samples remained high
- May 2009 – Remediation system restarted, two additional SVE wells installed; Total amount removed by October - 73.75 lbs of PCE and 7.45 lbs of TCE



## Ensign Carburetor (1956-1960)

- First industrial occupant of the site
- Reportedly operated a carburetor repair and rebuilding operations
- Solvent usage by Ensign Carburetor is unknown

# Arnold Engineering (1960-1988)

- Arnold Engineering and its successor company, Integrated Specialties, performed etching of metal for the electronics industry
- Process involved cutting metal parts, cleaning, coating with a photoresist mask, degreasing, coating, baking/hardening, etching, and stripping
- Chemical use included chlorinated solvent degreasers, caustics, acids, water rinses, ferric chloride



# Arnold Solvent Use Overview

- Metal sheets received and cut to size
- Cut metal parts were degreased via heated spray degreasers
- Degreased parts were further cleaned in open tanks using caustics, rinses, and unidentified cleaning solvents

# Arnold Solvent Use Overview

- Clean metal parts were coated with resist coating
- Coated parts were polymerized with infrared light and printed
- Printed metal parts were treated in the degreasers to remove the unpolymerized coating



# Arnold Solvent Use Overview

- UV light was used in a bake oven to harden the coating on the degreased sheets
- The sheets were etched with ferric chloride
- The remaining photo resist was stripped in open dip tanks filled with PCE

# Arnold Solvent Use - Degreasers

- Deposition by Dan Hopen indicates the degreaser solution was TCE and/or 1,1,1-TCA
- Degreasers were emptied once per week by maintenance staff into 55-gallon drums
- New and used degreaser solvent was stored outside north side of building



# Arnold Solvent Use – Stripping Area

- Deposition by Dan Hopen indicates the stripper solution was PCE
- Stripper dip tanks were drained into 5-gallon buckets
- Waste solvent was transferred to 55-gallon drums and stored outside on the east side of building

# Arnold Solvent Use – Stripping Area

- Stripper solution reportedly spilled frequently
- Stripped metal plates were allowed to drip onto a wooden platform that was rinsed approximately every 2 hours; platform was constructed above an uncoated concrete floor with a drain

# Arnold Solvent Use - Permitting

- Numerous permits obtained for use of solvents beginning in 1961



# 1961 Permit to Operate Two Degreasers

AIR POLLUTION CONTROL DISTRICT  
COUNTY OF ORANGE

## PERMIT

IS HEREBY GRANTED TO

ARNOLD ENGINEERING CO.

TO OPERATE

2 - DEGREASERS W/LIP EXHAUSTED TO ROOF

*1 Degreaser  
removed 1-11-79*

located at

1551 E. Orangethorpe, Fullerton, California

SUBJECT TO THE FOLLOWING CONDITIONS

THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY DIVISION 20, CHAPTER 2, ARTICLE 3, OF THE HEALTH AND SAFETY CODES OF THE STATE OF CALIFORNIA OR THE RULES AND REGULATIONS OF THE AIR POLLUTION CONTROL DISTRICT.

DATE 11/3/61

WILLIAM FITCHEN  
AIR POLLUTION CONTROL OFFICER

PERMIT NO 1253

By: CHAS. W. DOUGAN, Engineer (Title)

REVOCABLE AND NOT TRANSFERABLE

# 1970 Permit to Operate Two Baron Blakeslee Degreasers (1 of 2)

AIR POLLUTION CONTROL DISTRICT  
COUNTY OF ORANGE

## PERMIT

IS HEREBY GRANTED TO

THE ARNOLD ENGINEERING CO. PACIFIC DIV.,

TO OPERATE  
BARON BLAKESLEE DEGREASER SER. NO. 6230, 9-KVA,  
located at

1551 E. Orangethorpe Ave., Fullerton, Calif.

SUBJECT TO THE FOLLOWING CONDITIONS

THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY DIVISION 20, CHAPTER 2, ARTICLE 3, OF THE HEALTH AND SAFETY CODES OF THE STATE OF CALIFORNIA OR THE RULES AND REGULATIONS OF THE AIR POLLUTION CONTROL DISTRICT.

DATE June 1, 1970

WILLIAM FITCHEN  
AIR POLLUTION CONTROL OFFICER

PERMIT NO. 70-2190

By: Douglas P. Jeffrey (Title)  
Air Pollution Engineer

REVOCABLE AND NOT TRANSFERABLE

# 1970 Permit to Operate Two Baron Blakeslee Degreasers (2 of 2)

AIR POLLUTION CONTROL DISTRICT  
COUNTY OF ORANGE

## PERMIT

IS HEREBY GRANTED TO

THE ARNOLD ENGINEERING CO. PACIFIC DIV.,

TO OPERATE

BARON BLAKESLEE DEGREASER SER. NO. 5918, 12-KVA

located at

1551 E. Orangethorpe Ave., Fullerton, Calif.

SUBJECT TO THE FOLLOWING CONDITIONS

THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY DIVISION 20, CHAPTER 2, ARTICLE 3, OF THE HEALTH AND SAFETY CODES OF THE STATE OF CALIFORNIA OR THE RULES AND REGULATIONS OF THE AIR POLLUTION CONTROL DISTRICT.

DATE June 1, 1970

WILLIAM FITCHEN  
AIR POLLUTION CONTROL OFFICER

PERMIT NO. 70-2192

By: Douglas F. Jeffrey (Title)  
Air Pollution Engineer

REVOCABLE AND NOT TRANSFERABLE



# 1975 Permit to Operate Two Delta Degreasers (1 of 2)

AIR POLLUTION CONTROL DISTRICT  
COUNTY OF ORANGE

## PERMIT

IS HEREBY GRANTED TO  
ARNOLD ENGINEERING CO.

TO OPERATE

Delta degreaser DH525 (series number D4020)  
36" x 68" x 78" (830 gallon capacity)  
located at  
1551 E. Orangethorpe, Fullerton, Calif.

SUBJECT TO THE FOLLOWING CONDITIONS

THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY  
DIVISION 20, CHAPTER 2, ARTICLE 3, OF THE HEALTH AND SAFETY CODES OF THE STATE OF CALIFORNIA OR THE RULES  
AND REGULATIONS OF THE AIR POLLUTION CONTROL DISTRICT.

DATE 4-23-75

H. G. OSBORNE

AIR POLLUTION CONTROL OFFICER

PERMIT NO. 75-4479

By:

Bob Nishimura (Title)  
Air Pollution Engineer

F 0116-14 1

REVOCABLE AND NOT TRANSFERABLE

# 1975 Permit to Operate Two Delta Degreasers (2 of 2)

AIR POLLUTION CONTROL DISTRICT  
COUNTY OF ORANGE

## PERMIT

IS HEREBY GRANTED TO  
ARNOLD ENGINEERING CO.  
TO OPERATE  
Delta degreaser DH525 (series number D3062)  
36" x 68" x 78" (830 gallon capacity)  
located at  
1551 E. Orangethorpe, Fullerton, Calif.  
SUBJECT TO THE FOLLOWING CONDITIONS

THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY  
DIVISION 20, CHAPTER 2, ARTICLE 3, OF THE HEALTH AND SAFETY CODES OF THE STATE OF CALIFORNIA OR THE RULES  
AND REGULATIONS OF THE AIR POLLUTION CONTROL DISTRICT.


DATE 4-23-75

PERMIT NO. 75-4480

H. G. OSBORNE  
AIR POLLUTION CONTROL OFFICER

By: \_\_\_\_\_  
Bob Nishimura (Title)  
Air Pollution Engineer

REVOCABLE AND NOT TRANSFERABLE

 F 0118-14.1

# 1976 Permit to Operate Custom Degreaser

## SOUTHERN CALIFORNIA AIR POLLUTION CONTROL DISTRICT

~~ORANGE COUNTY ZONE~~ SOUTHERN ZONE

# PERMIT

IS HEREBY GRANTED TO  
THE ARNOLD ENGINEERING COMPANY

TO OPERATE

Solvent degreaser, 24" wide x 24" long x 30"  
high; 3 KW electric heater, custom made  
located at  
1551 E. Orangethorpe, Fullerton, CA 92634

SUBJECT TO THE FOLLOWING CONDITIONS

THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY  
DIVISION 20, CHAPTER 2, ARTICLE 3, OF THE HEALTH AND SAFETY CODES OF THE STATE OF CALIFORNIA OR THE RULES  
AND REGULATIONS OF THE AIR POLLUTION CONTROL DISTRICT

DATE June 17, 1976

H. G. OSBORNE  
AIR POLLUTION CONTROL OFFICER

PERMIT NO. 76-6303


By: WARREN TALBOT (Title)  
CHIEF ENGINEERING & ANALYSIS

FD250-45

REVOCABLE AND NOT TRANSFERABLE



# 1977 Permit to Operate Four Stripper Tanks (1 of 4)

		SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT	
<b>PERMIT to OPERATE</b>		S 00093	
SOUTHERN ZONE - 1810 E. Ball Road, Anaheim, California 92805			
Operation under this permit must be conducted in compliance with all information included with the initial application and the initial permit conditions. The equipment must be properly maintained and kept in good operating condition at all times. In accordance with Rule 206, this Permit to Operate or copy must be posted on or within 8 meters of equipment.			
LEGAL OWNER OR OPERATOR: <b>ARNOLD ENGINEERING COMPANY</b>		00501A	
EQUIPMENT LOCATED AT: <b>1551 EAST ORANGETHORPE AVENUE, FULLERTON, CALIFORNIA 92634</b>			
EQUIPMENT DESCRIPTION AND CONDITIONS:			
<b>STRIPPER TANK, NICKEL PLATES, VAPOR TYPE, 1'-9" W. X 2'-1" L. X 2'-9" H., 3 KVA ELECTRICALLY HEATED, PD 423A.</b>		FILE COPY	
<b>CONDITIONS:</b>			
<b>1. PHOTOCHEMICALLY REACTIVE SOLVENT MUST NOT BE USED IN THIS EQUIPMENT UNLESS THE EMISSION OF ORGANIC MATERIALS INTO THE ATMOSPHERE IS REDUCED BY AT LEAST 85 PERCENT BY WEIGHT.</b>			
This initial permit must be renewed by <b>5-18-78</b> or an earlier date if equipment is moved, altered, or changes ownership. If billing for annual renewal fee (Rule 301.f) not received by expiration date, contact Zone office above.			
This permit does not authorize the emission of air contaminants in excess of those allowed by Division 26 of the Health and Safety Code of the State of California or the Rules of the Air Quality Management District. This permit cannot be considered as permission to violate existing laws, ordinances, regulations or statutes of other government agencies.			
<b>087822 \$25.00</b>		<b>AIR POLLUTION CONTROL OFFICER</b>	
<b>VOID UNLESS VALIDATED</b>		BY <b>Joseph Tramma</b>	
		DATE <b>5-18-77</b>	
		78P235S- 2/77	

# 1977 Permit to Operate Four Stripper Tanks (2 of 4)



SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

## PERMIT to OPERATE

SOUTHERN ZONE - 1810 E. Ball Road, Anaheim, California 92805

S 00095

Operation under this permit must be conducted in compliance with all information included with the initial application and the initial permit conditions. The equipment must be properly maintained and kept in good operating condition at all times. In accordance with Rule 206, this Permit to Operate or copy must be posted on or within 8 meters of equipment.

LEGAL OWNER  
OR OPERATOR:

ARNOLD ENGINEERING COMPANY

EQUIPMENT  
LOCATED AT:

1551 EAST ORANGETHORPE AVENUE, FULLERTON, CALIFORNIA 92634

EQUIPMENT DESCRIPTION AND CONDITIONS:

STRIPPER TANK, NICKEL PLATES, VAPOR TYPE, 1'-9" W. X 2'-1" L. X  
2'-9" H., 3 KVA ELECTRICALLY HEATED, PD 428.

### CONDITIONS:

1. PHOTOCHEMICALLY REACTIVE SOLVENT MUST NOT BE USED IN THIS EQUIPMENT, UNLESS THE EMISSION OF ORGANIC MATERIALS INTO THE ATMOSPHERE IS REDUCED BY AT LEAST 85 PERCENT BY WEIGHT.

This initial permit must be renewed by 5-18-78 or an earlier date if equipment is moved, altered, or changes ownership. If billing for annual renewal fee (Rule 301.f) not received by expiration date, contact Zone office above.

This permit does not authorize the emission of air contaminants in excess of those allowed by Division 26 of the Health and Safety Code of the State of California or the Rules of the Air Quality Management District. This permit cannot be considered as permission to violate existing laws, ordinances, regulations or statutes of other government agencies.

087822 \$25.00


VOID UNLESS VALIDATED

AIR POLLUTION CONTROL OFFICER

BY Joseph Tramma  
DATE 5-18-77

FILE COPY

# 1977 Permit to Operate Four Stripper Tanks (3 of 4)

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT	
	<b>PERMIT to OPERATE</b>
SOUTHERN ZONE - 1610 E. Ball Road, Anaheim, California 92805	
Operation under this permit must be conducted in compliance with all information included with the initial application and the initial permit conditions. The equipment must be properly maintained and kept in good operating condition at all times. In accordance with Rule 206, this Permit to Operate or copy must be posted on or within 8 meters of equipment.	
LEGAL OWNER OR OPERATOR:	ARNOLD ENGINEERING COMPANY
EQUIPMENT LOCATED AT:	1551 EAST ORANGETHORPE AVENUE, FULLERTON, CALIFORNIA 92634
EQUIPMENT DESCRIPTION AND CONDITIONS:	
STRIPPER TANK, NICKEL PLATES, VAPOR TYPE, 1'-9" W. X 2'-1" L. X 2'-9" H., 3 KVA ELECTRICALLY HEATED, PD 429.	
CONDITIONS:	
1. PHOTOCHEMICALLY REACTIVE SOLVENT MUST NOT BE USED IN THIS EQUIPMENT, UNLESS THE EMISSION OF ORGANIC MATERIALS INTO THE ATMOSPHERE IS REDUCED BY AT LEAST 85 PERCENT BY WEIGHT.	
This initial permit must be renewed by 5-18-78 or an earlier date if equipment is moved, altered, or changes ownership. If billing for annual renewal fee (Rule 301.1) not received by expiration date, contact Zone office above.	
This permit does not authorize the emission of air contaminants in excess of those allowed by Division 26 of the Health and Safety Code of the State of California or the Rules of the Air Quality Management District. This permit cannot be considered as permission to violate existing laws, ordinances, regulations or statutes of other government agencies.	
087822 \$25.00	AIR POLLUTION CONTROL OFFICER
VOID UNLESS VALIDATED	BY Joseph Trammis DATE 5-18-77

75P2353- 2/77



# 1977 Permit to Operate Four Stripper Tanks (4 of 4)



SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

## PERMIT to OPERATE

S 00097

SOUTHERN ZONE - 1610 E. Ball Road, Anaheim, California 92805

Operation under this permit must be conducted in compliance with all information included with the initial application and the initial permit conditions. The equipment must be properly maintained and kept in good operating condition at all times. In accordance with Rule 206, this Permit to Operate or copy must be posted on or within 8 meters of equipment.

LEGAL OWNER  
OR OPERATOR:

ARNOLD ENGINEERING COMPANY

EQUIPMENT

LOCATED AT:

1551 EAST ORANGETHORPE AVENUE, FULLERTON, CALIFORNIA 92634

EQUIPMENT DESCRIPTION AND CONDITIONS:

STRIPPER TANK, NICKEL PLATES, VAPOR TYPE, 1'-9" W. X 2'-1" L. X 2'-9" H.,  
3 KVA ELECTRICALLY HEATED, PD 277A.

### CONDITIONS:

1. PHOTOCHEMICALLY REACTIVE SOLVENT MUST NOT BE USED IN THIS EQUIPMENT, UNLESS THE EMISSION OF ORGANIC MATERIALS INTO THE ATMOSPHERE IS REDUCED BY AT LEAST 85 PERCENT BY WEIGHT.

This initial permit must be renewed by 5-18-78 or an earlier date if equipment is moved, altered, or changes ownership. If billing for annual renewal fee (Rule 301.1) not received by expiration date, contact Zone office above.

This permit does not authorize the emission of air contaminants in excess of those allowed by Division 26 of the Health and Safety Code of the State of California or the Rules of the Air Quality Management District. This permit cannot be considered as permission to violate existing laws, ordinances, regulations or statutes of other government agencies.

087822 \$25.00

VOID UNLESS VALIDATED

AIR POLLUTION CONTROL OFFICER


BY Joseph Tramma

DATE 5-18-77

76P2368 2/77

FILE COPY

# 1977 Permit for 1,1,1-TCA Storage Tank

	SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT	
	<b>PERMIT to OPERATE</b>	
SOUTHERN ZONE - 1810 E. Ball Road, Anaheim, California 92805		
S 00094		
Operation under this permit must be conducted in compliance with all information included with the initial application and the initial permit conditions. The equipment must be properly maintained and kept in good operating condition at all times. In accordance with Rule 206, this Permit to Operate or copy must be posted on or within 8 meters of equipment.		
LEGAL OWNER OR OPERATOR:	ARNOLD ENGINEERING COMPANY	
EQUIPMENT LOCATED AT:	1551 EAST ORANGETHORPE AVENUE, FULLERTON, CALIFORNIA 92634	
EQUIPMENT DESCRIPTION AND CONDITIONS:		00303A
STORAGE TANK, 1, 1, 1 TRICHLOROETHANE, KEESEE, ABOVE GROUND, 550 GAL., 3'-10" DIA. X 6'-9" H.		FILE COPY
This initial permit must be renewed by 5-18-78 or an earlier date if equipment is moved, altered, or changes ownership. If billing for annual renewal fee (Rule 301.1) not received by expiration date, contact Zone office above.		
This permit does not authorize the emission of air contaminants in excess of those allowed by Division 26 of the Health and Safety Code of the State of California or the Rules of the Air Quality Management District. This permit cannot be considered as permission to violate existing laws, ordinances, regulations or statutes of other government agencies.		AIR POLLUTION CONTROL OFFICER
087822 \$25.00		BY Joseph Tramma
VOID UNLESS VALIDATED		DATE 5-18-77

TSP 2355- 2/77

# 1979 Permit to Operate a Spray Booth



SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

## PERMIT to OPERATE

SOUTHERN ZONE - 1610 E. Ball Road, Anaheim, California 92805

S 02801

Operation under this permit must be conducted in compliance with all information included with the initial application and the initial permit conditions. The equipment must be properly maintained and kept in good operating condition at all times. In accordance with Rule 206, this Permit to Operate or copy must be posted on or within 8 meters of equipment.

LEGAL OWNER  
OR OPERATOR: THE ARNOLD ENGINEERING COMPANY

APPL. NO. 03527A

EQUIPMENT  
LOCATED AT: 1551 EAST ORANGETHORPE AVENUE, FULLERTON, CALIFORNIA

EQUIPMENT DESCRIPTION AND CONDITIONS:

SPRAY BOOTH, CUSTOM, BENCH DRY FILTER TYPE, 7'-3" W. x 4'-9" H. x 2'-6" D., WITH ONE 1/2 H.P. EXHAUST FAN AND FOUR EXHAUST FILTERS, EACH 16" x 25" x 2".

CONDITIONS:

1. THIS SPRAY BOOTH MUST NOT BE OPERATED UNLESS ALL EXHAUST AIR PASSES THROUGH THE FILTERING MEDIA.
2. PHOTOCHEMICALLY REACTIVE SOLVENT MUST NOT BE USED TO THIN, REDUCE OR DILUTE COATING MATERIALS USED IN THIS EQUIPMENT.

(CONTINUED ON PAGE 2)

This initial permit must be renewed by JANUARY 26, 1980 or an earlier date if equipment is moved, altered, or changes ownership. If billing for annual renewal fee (Rule 301.1) not received by expiration date, contact Zone office above.

This permit does not authorize the emission of air contaminants in excess of those allowed by Division 26 of the Health and Safety Code of the State of California or the Rules of the Air Quality Management District. This permit cannot be considered as permission to violate existing laws, ordinances, regulations or statutes of other government agencies.

SCAQMD 001

3750Da 526R

VOID UNLESS VALIDATED

AIR POLLUTION CONTROL OFFICER

BY

DATE

1/26/79

76P235S- 2/77

FILE COPY



# Arnold Solvent Usage – Waste Disposal

- No wastewater treatment system for VOCs was reported to exist
- Wastewater treatment system consisted of
  - neutralization tank for acid neutralization of process water
  - clarifiers for removal of suspended solids and floating materials

# Arnold Solvent Usage – Waste Disposal

- Neutralization tank received process water from:
  - Cleaning area (caustics, unidentified solvents)
  - Etching (ferric chloride)
  - Stripping (PCE)
- Wastewater stream discharged to city sewer system

## 2009 Declaration of Donalee Farmer

- Worked at the site for Ensign and Arnold from 1956 to 1986
- Duties included environmental compliance, including handling, replacement, and disposal of chemicals used by Arnold
- Arnold initially installed one solvent degreaser, two more added around 1976 as part of chemical milling operation



## 2009 Declaration of Donalee Farmer

- “Over the 25 years I worked at Arnold, only one solvent was used in the degreasers. That solvent was 1,1,1-trichloroethane (“1,1,1-TCA”). Arnold never used perchloroethylene (“PCE”) or trichloroethylene (“TCE”) in any aspect of its operations at 1551 East Orangethorpe to my knowledge.”



Exhibit  
745

1969 TCE Survey  
(dated 3/30/70)  
noting purchase  
of 250 gal/mo.  
virgin TCE and  
return of 300  
gal/mo. used  
TCE; signed by  
Don Farmer.

Also notes TCE  
used in 3  
degreasers and  
1,1,1-TCA used  
in 2 degreasers.

OK 9/18/70 S.E. O

1969 TRICHLOROETHYLENE SURVEY

Investigator Jarvis

NAME ARMON D. FARMER

ADDRESS 1551 E. ORANGE AVE, FULLERTON

DECREASED 710 #1253 (2 under one permit) plus two more new ones with no permit - will acquire

DATE 3-30-70 Don Farmer

1. Trichloroethylene (virgin) purchased. 250 gal/month

2. Amount returned for reclaim. 300 gal/month for 100 gal

3. Amount reclaimed trichloroethylene received.

4. Did you use other solvents? Trichloroethylene

5. Which ones? Trichloroethylene

6. How much of each? 3 gal/day

50 gal/mo - 30 x 1.7 gal/day

Triclor used in 3  
1,1,1 triclor in 2

NGSC55462 44



Exhibit  
745

1970 TCE Survey  
(dated 9/10/70)  
noting purchase  
of 150 gal/mo.  
of TCE.

Also notes TCE  
used in 3  
degreasers and  
1,1,1-TCA used  
in 2 degreasers.

1. AMOUNT OF TRICHLOROETHYLENE PURCHASED TO DATE THIS YEAR 150 gal/mo
2. NUMBER OF DAYS PER WEEK PLANT OPERATED (AVERAGE) 5
3. NUMBER OF DAYS DEGREASER USED PER WEEK (AVERAGE) 5
4. NUMBER OF DEGREASERS USING TRICHLOROETHYLENE 3

Investigator Jarvis  
Date 9-10-70

*Triclor used in 3 degreasers*

*1,1,1 trichlor used in 2 degreasers*  
*ethane*

*2.5 gal/day*



Exhibit  
745

1973 Degreaser  
Summary  
noting  
purchase of  
new TCE and  
1,1,1-TCA and  
return of used  
TCE and 1,1,1-  
TCA

DEGREASER SURVEY

Firm

Arnold Engineering Co.

Address

1551 E. Orange Harbor, Full.

Degreaser P/O

#1253, #70-2190, #70-2191, #70-2192

Date

2-26-73

1. Type of Solvent

Trichloroethane & Trichloroethylene

2. Amount purchased (virgin)

2,720 gal + 1,590 gal

3. Amount returned for reclaim

1,200 gal + 550 gal

4. Amount of reclaimed solvent received

Exhibit  
746

1977 Degreaser  
Summary  
noting PCE use  
in custom built  
stripper tank;  
signed by Don  
Farmer

**SOUTHERN CALIFORNIA AIR POLLUTION CONTROL DISTRICT**  
**SOUTHERN ZONE**  
1610 E. Ball Road, Anaheim, CA 92805  
(714) 991-7265

**DEGREASER SUMMARY**

**RECEIVED**  
**APR 7 1977**  
SOUTHERN CALIFORNIA  
AIR POLLUTION CONTROL DISTRICT  
SOUTHERN ZONE

One copy of this form must be filled out completely for each degreaser and submitted with the application for permit.

1. BUSINESS LICENSE NAME OF CORPORATION, COMPANY, OR INDIVIDUAL UNDER WHICH APPLICATION IS SUBMITTED:		
Arnold Engineering Company		
2. DEGREASER MANUFACTURER, MODEL NUMBER & SERIAL NUMBER:		
Custom Built Stripper Tank		
3. OUTSIDE DIMENSIONS OF TANK:		
21"	13"	25"
4. TYPE OF VAPOR LEVEL CONTROL:		
thermostat <input type="checkbox"/>	water bath <input checked="" type="checkbox"/>	other <input type="checkbox"/> Control at 185 degrees F.
5. DEPTH FROM TOP OF TANK TO VAPOR LEVEL CONTROL DEVICE:		
6 inches		
6. METHOD OF HEATING:		
gas <input type="checkbox"/>	electric <input checked="" type="checkbox"/>	steam <input type="checkbox"/> none <input type="checkbox"/>
7. LIST ALL TYPES AND QUANTITIES OF DEGREASER SOLVENT USED:		
trichloroethylene 4.62 gal. drums per month perchloroethylene 85% Perc. other (specify):		
8. OPERATIONAL DATA:		
normal operating schedule: 8 hrs/day 5 days/week articles degreased: Nickel Sheets		
9. EVAPORATION RATE OF GAS PER HOUR:		
3 lb		
10. USE:		
THE ABOVE INFORMATION IS SUBMITTED TO DESCRIBE THE USE OF THE DEGREASER FOR WHICH APPLICATION FOR PERMIT IS BEING MADE ON THE ACCOMPANYING FORM		
SIGNATURE OF RESPONSIBLE MEMBER OF FIRM: Don Farmer		
TYPE OR PRINT NAME AND OFFICIAL TITLE OF PERSON SPOKING THIS DATA FORM:	NAME: Don Farmer	
	TITLE: Maintenance Manager	
DO NOT WRITE BELOW THIS LINE		
APPL. NO. (Do not include less than 12.1 Gal.)	APPL. DATE	DATE
12.1 Gal.		
COMMENTS:	APPROVED BY	RECEIVED BY

NGSC56659 47

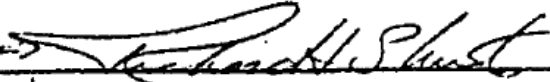


Degreaser  
Summary  
(undated, prior  
to 1976) noting  
TCE use in  
Baron  
Blakeslee  
degreaser

COUNTY OF ORANGE  
AIR POLLUTION CONTROL DISTRICT  
1010 South Harbor Blvd.  
Anaheim, Ca. 92805

## DEGREASER SUMMARY

ONE COPY OF THIS FORM MUST BE FILLED OUT COMPLETELY FOR EACH DEGREASER  
AND MUST ACCOMPANY THE TRIPLICATE APPLICATION FOR PERMIT

1. BUSINESS LICENSE NAME OF CORPORATION, COMPANY, OR INDIVIDUAL OWNER OR GOVERNMENTAL AGENCY UNDER WHICH APPLICATION IS SUBMITTED:		
<b>THE ARNOLD ENGINEERING CO. PACIFIC DIV.</b>		
2. DEGREASER MANUFACTURER, MODEL NUMBER & SERIAL NUMBER:		
<b>BARON BLAKESLEE      SER. # D-5918      MODEL # BK-520E</b>		
3. OUTSIDE DIMENSIONS OF TANK:		
<b>24"      WIDE x      50"      HIGH x      38"      LONG</b>		
4. TYPE OF VAPOR LEVEL CONTROLS:		
THERMOSTATIC <input type="checkbox"/> WATER RING <input type="checkbox"/> OTHER <input checked="" type="checkbox"/> NONE <input type="checkbox"/>		
5. DEPTH FROM RIM OF TANK TO VAPOR LEVEL CONTROL DEVICE:		
<b>14"      INCHES</b>		
6. METHOD OF HEATING:		
GAS <input type="checkbox"/> ELECTRIC <input checked="" type="checkbox"/> STEAM <input type="checkbox"/> HEAT <input type="checkbox"/>		
7. LIST ALL TYPES AND QUANTITY OF DEGREASER SOLVENT USED:		
TRICHLOROETHYLENE <b>2 GAL. 25 GAL. PER DAY</b> (DAY OTHER CONVENIENT MEASURE SUCH AS LBS. PER DAY OR GALS. PER DAY MAY BE USED IF DESIRED)		
PERCHLOROETHYLENE <b>55 GAL. DRUMS PER MONTH</b>		
OTHER (DESCRIBE) _____		
8. OPERATIONAL DATA:		
USUAL OPERATING SCHEDULE <b>8</b> HRS/DAY <b>5</b> DAYS/ WEEK		
ARTICLES DEGREASED: _____		
THE ABOVE INFORMATION IS SUBMITTED TO DESCRIBE THE USE OF THE DEGREASER FOR WHICH APPLICATION FOR PERMIT IS BEING MADE ON THE ACCOMPANYING FORM		
SIGNATURE OF RESPONSIBLE MEMBER OF FIRM: 		
TYPE OR PRINT NAME AND OFFICIAL TITLE OF PERSON SIGNING THIS DATA FORM.	NAME <b>RICHARD H. SHUTE</b>	
	TITLE <b>CHEMICAL MILLING DIV. MANAGER</b>	
DO NOT WRITE BELOW THIS LINE		
AVG. DAILY SOLVENT LOSS TO ATMOSPHERE		FILE NO.      DATE
COMMENTS:		PROCESSED BY
		CHECKED BY

NGSC55437



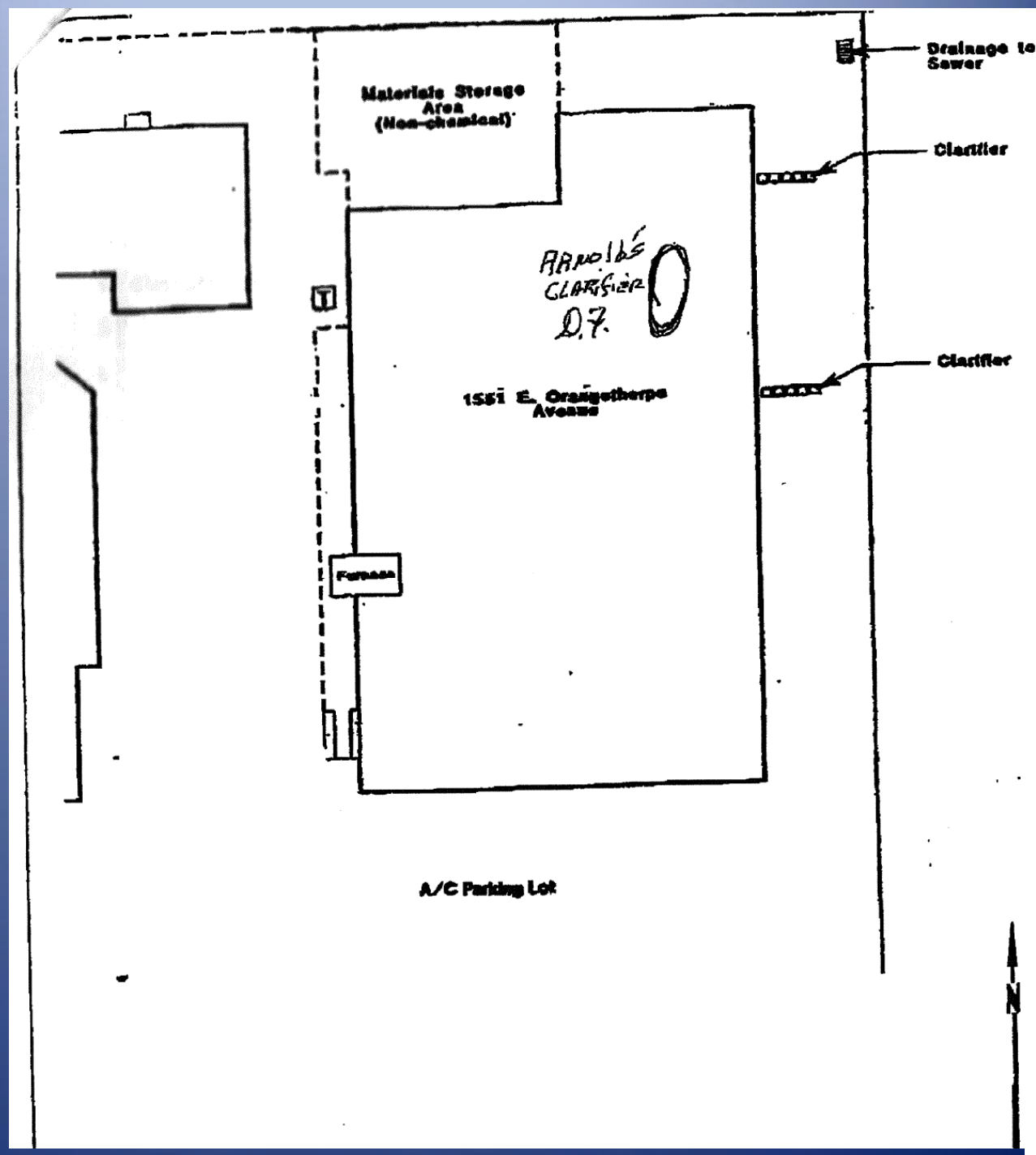
## 2009 Declaration of Donalee Farmer

- New 1,1,1-TCA was delivered in 55-gallon drums and stored inside next to degreaser
- Used 1,1,1-TCA was pumped directly out of degreasers to a pump truck to be hauled away
- On some occasions, used 1,1,1-TCA was pumped into drums that were stored inside next to the degreasers

## 2009 Declaration of Donalee Farmer

- “Arnold used only this one clarifier. The map attached as Exhibit “D” appears to show to clarifiers located outside the Arnold plant. However, I do no recall a clarifier at these locations or anywhere outside the plant at any time during Arnold’s occupation.”

Exhibit "D"  
showing Donalee  
Farmer's  
depiction of the  
single clarifier  
location



# 1988 BCL Assoc. Environmental Site Assessment

- Donalee Farmer attended the 1986 BCL Assoc. site inspection
- Five industrial wastewater clarifiers were observed during site inspection:
  - Two outside the building on the east side
  - One in the etch room
  - One in the drag-out room
  - One near the center of the building



# Eye Encounter

- Occupied the site from 1989 to 1992
- Parent company of Woodmill Products
- SCAQMD permits did not indicate use of chlorinated solvents

# Woodmill Products

- Occupied the site from 1990 to at least 1992
- Manufactured picture frames and performed silk screening operations
- 1990 City of Fullerton Fire Department hazardous materials inventory did not contain chlorinated solvents

# Woodmill Products

- 1996 Phase I ESA indicated use of paint, wood finish, thinners, and solvents

# Marion Mfg., Inc.

- Occupied the site in 1992
- No information available regarding operations or chemical usage



# Princess Frames

- Occupied the site from 1992 to 1993
- May have been associated with Woodmill Products
- No information available regarding operations or chemical usage

# Elden Collections/Country Affaire

- Occupied the site since 1995
- Manufactures wooden furniture; the process includes staining, sealing, and coating with lacquer; coatings applied in spray booth
- Operates under SCAQMD permits prohibiting the use of carcinogenic air contaminants, including PCE, TCE, and 1,1,1-TCA

# Elden Collections/Country Affaire

- A 1996 Phase I ESA Update reported that up to 20% of the space was leased by Johnson Controls to store battery casings
- The 1996 Phase I ESA Update did not identify storage or use of chlorinated solvents on the property



# Elden Collections/Country Affaire

- 2001 City of Fullerton Fire Department hazardous materials inventory did not contain chlorinated solvents
- Numerous complaints of solvent, paint, lacquer, paint thinner, and urethane odors filed from 1996 to 2005; inspections did not mention presence of or use of chlorinated solvents

# Adjacent Properties

- 1550 E. Kimberly - Johnson Controls
  - No indication of COC use except for maintenance of equipment
  - PCE, TCE, 1,1,1-TCA, and 1,1-DCE present in soil along southern property boundary
  - PCE, TCE, and 1,1-DCE present in soil gas samples along southern property boundary
  - TCE and 1,1-DCE detected in groundwater
  - No evidence of significant solvent use, but performed soil remediation under RWQCB orders

# Adjacent Properties

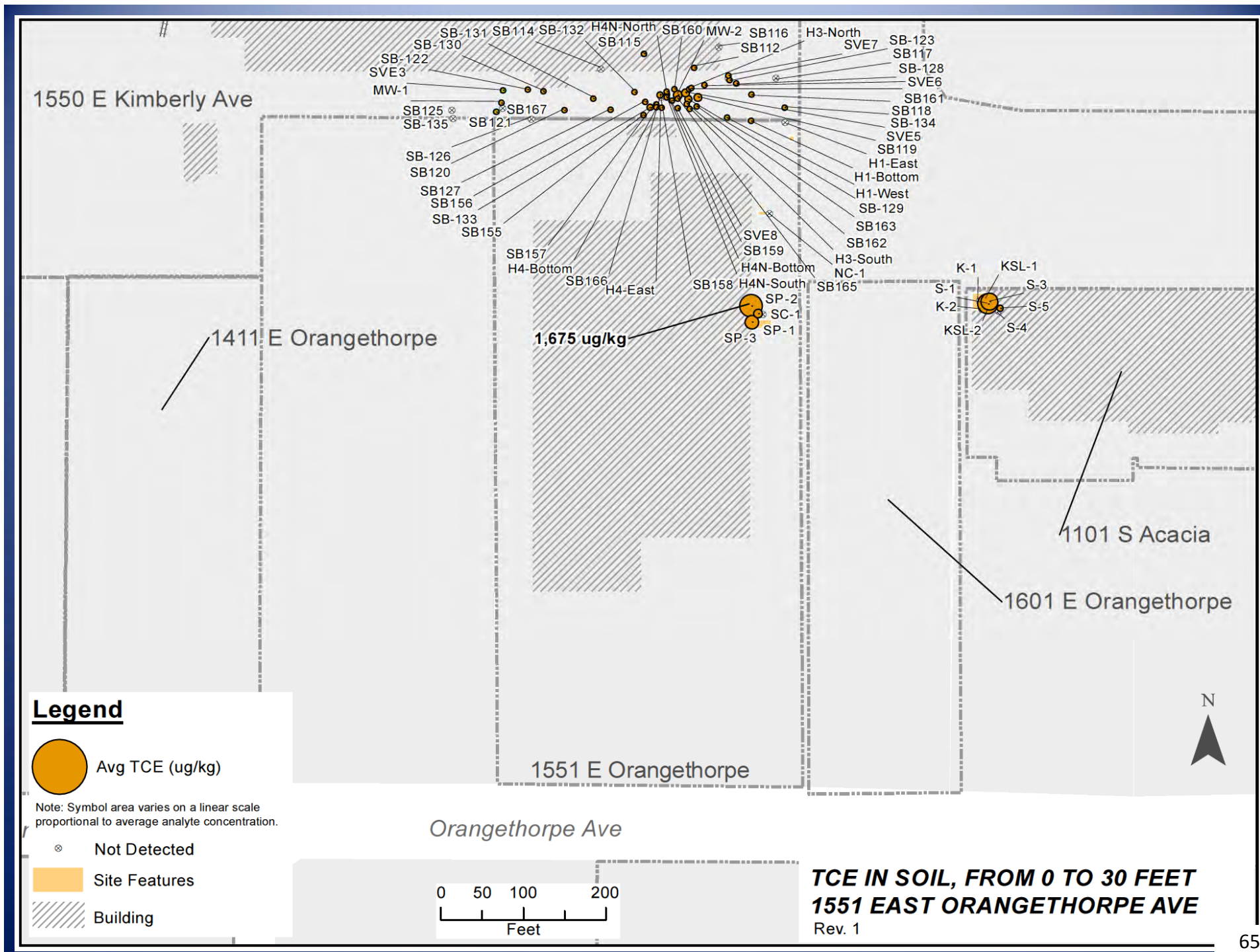
- 1101 S. Acacia – Jonathan Manufacturing
  - 1966 to at least 2002 - Manufactured motors, drives, and rotating equipment for electronics
  - Used small aerosol cans containing PCE and 1,1,1-TCA
  - 1989 – PCE (up to 1,200 ppb) and TCE (up to 1,300 ppb) found in soils near UST
  - From 1993 to 1998, did not report PCE disposal, but from 1999 to 2001 reported disposal ranging from 9.1 tons to 12.6 tons



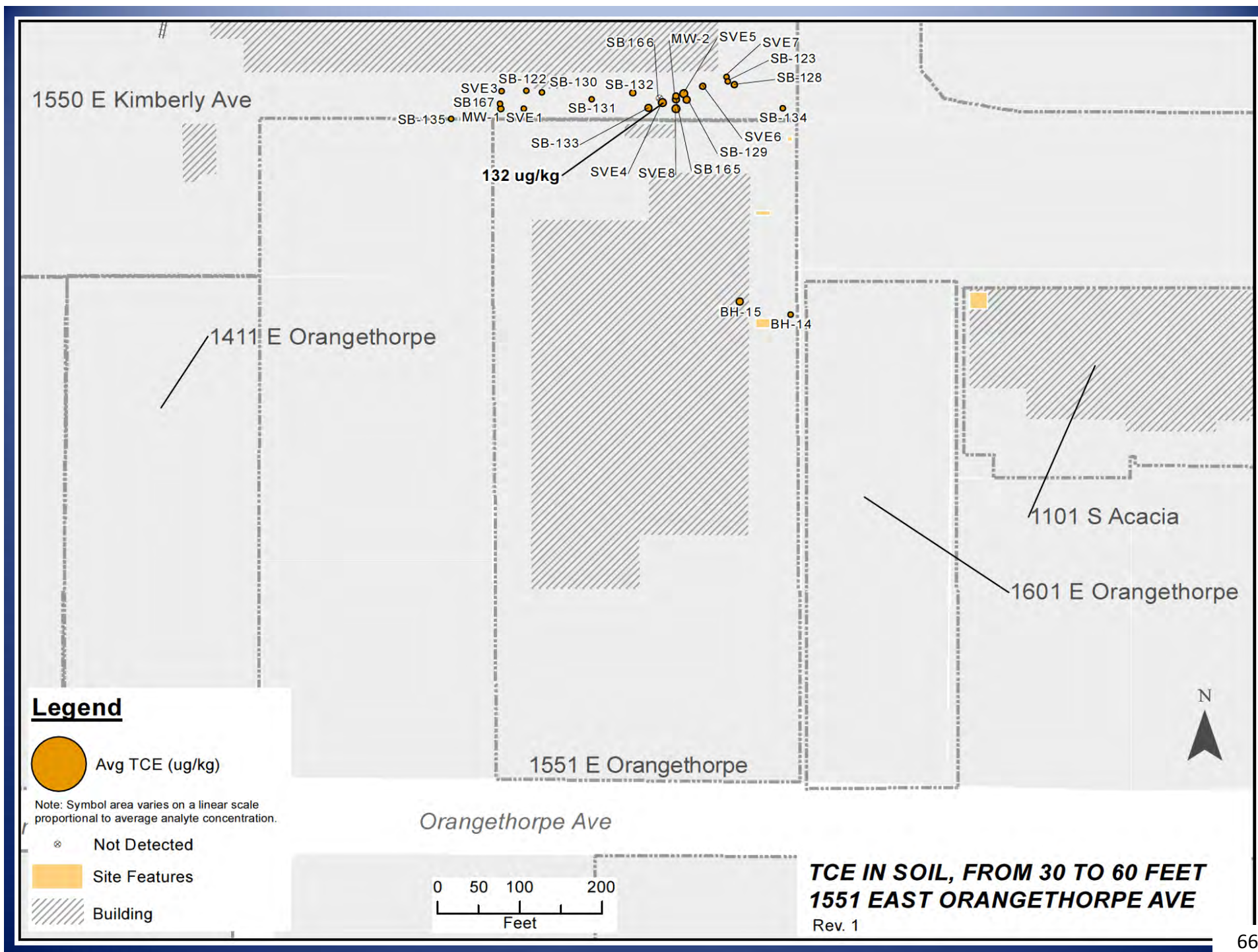
# Adjacent Properties

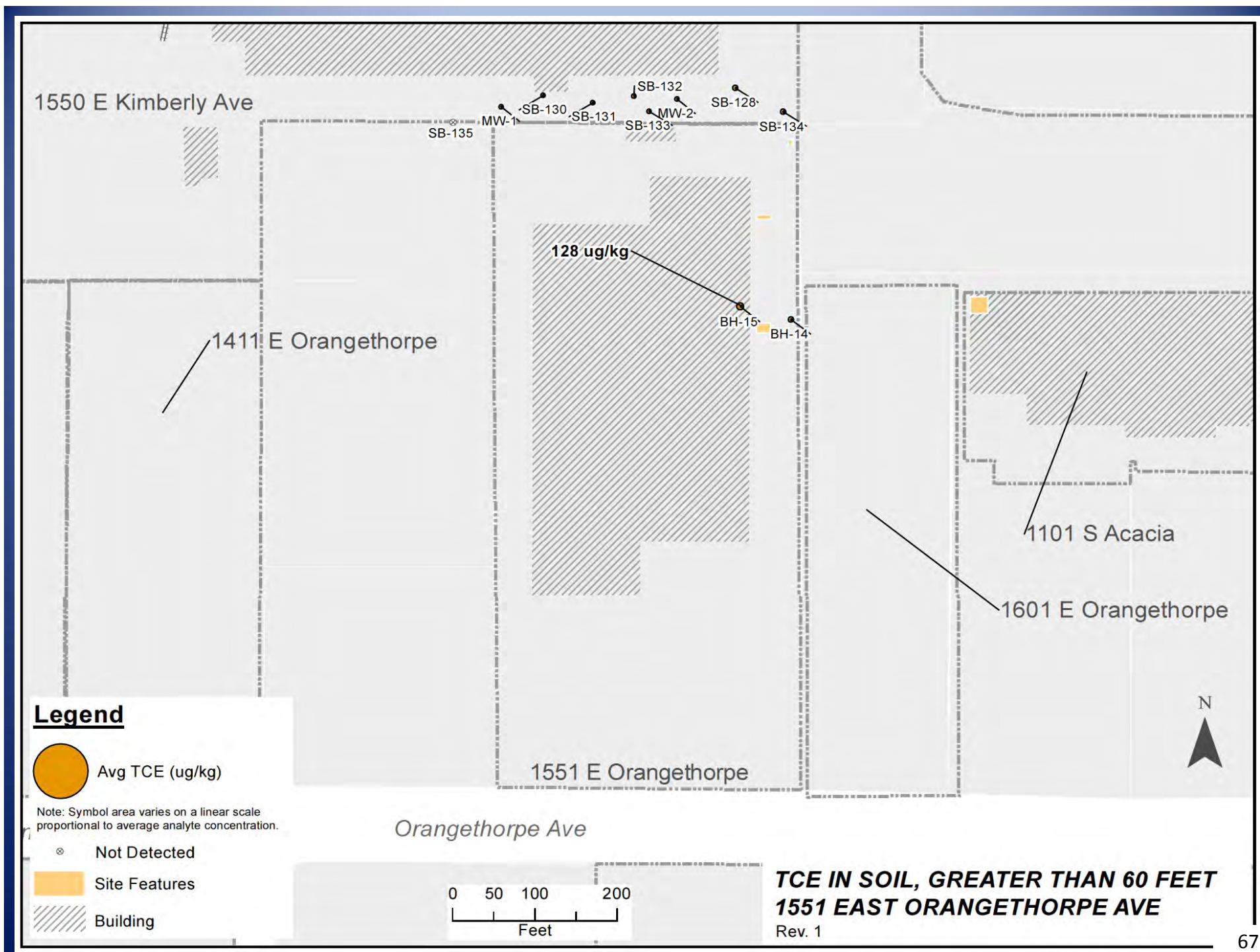
- 1601 E. Orangethorpe
  - 1968 (?) to 1971 – CAW Metal Fabricators – 55-gallons of “solvent” (FFD in 1968)
  - 1973 to 1977 – Everest Electronics – TCE degreaser (FFD in 1973)
  - 1978 to at least 1983 – Sundstrand Aviation
    - 1973 to 1983 – Small PCE degreaser
    - 1983 to ? – Small 1,1,1-TCA degreaser
  - No environmental data are available

# Soils

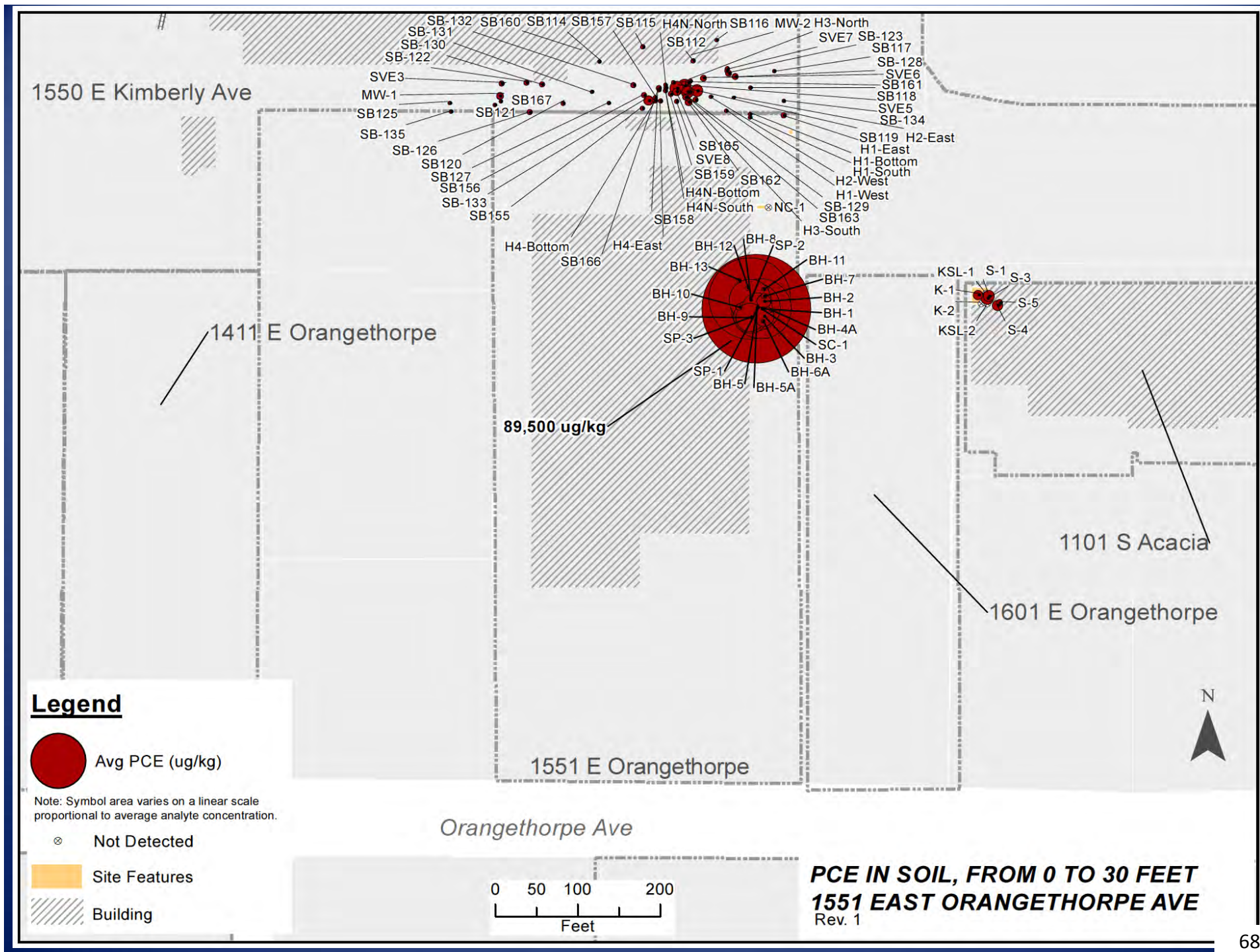




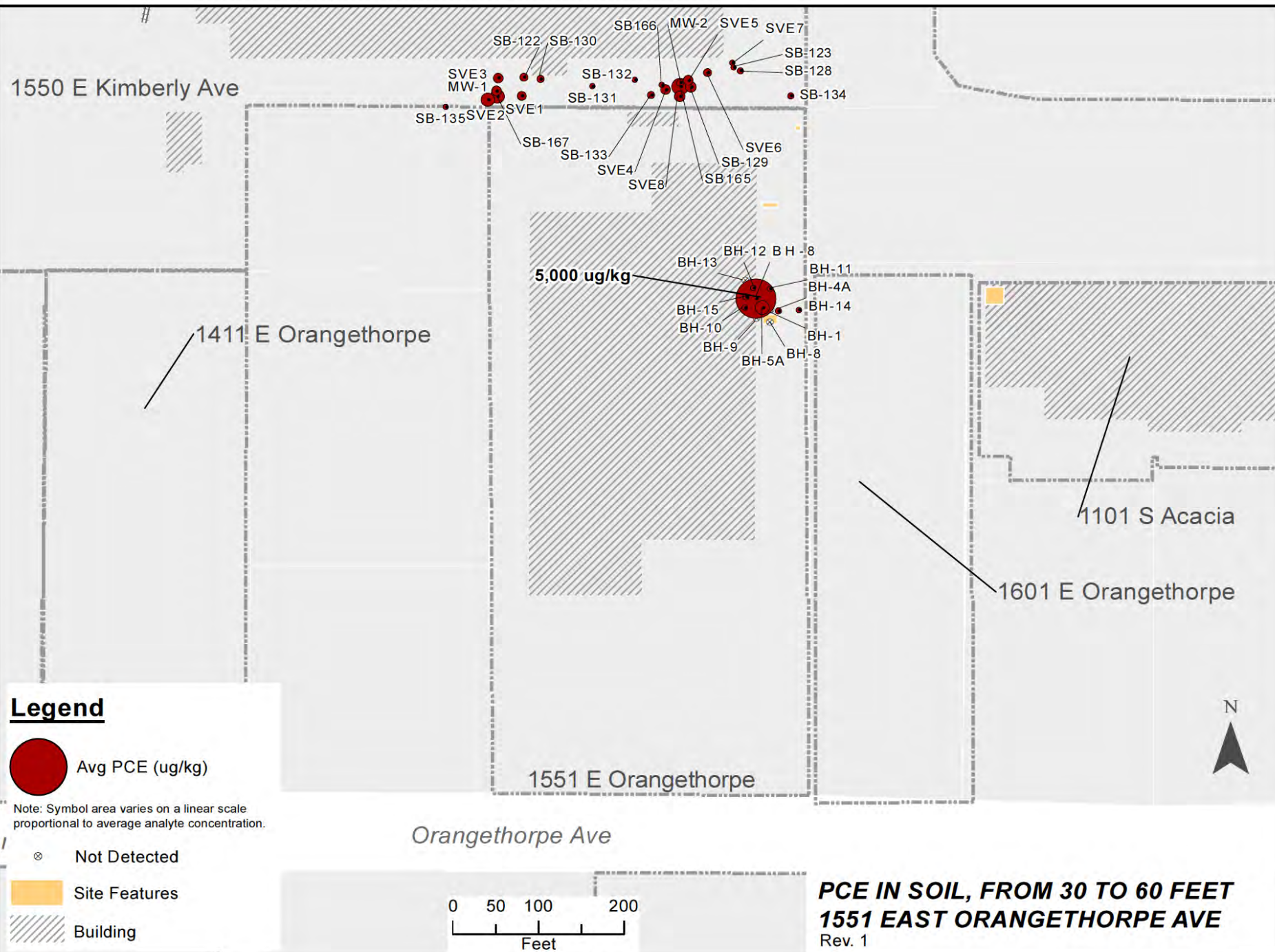


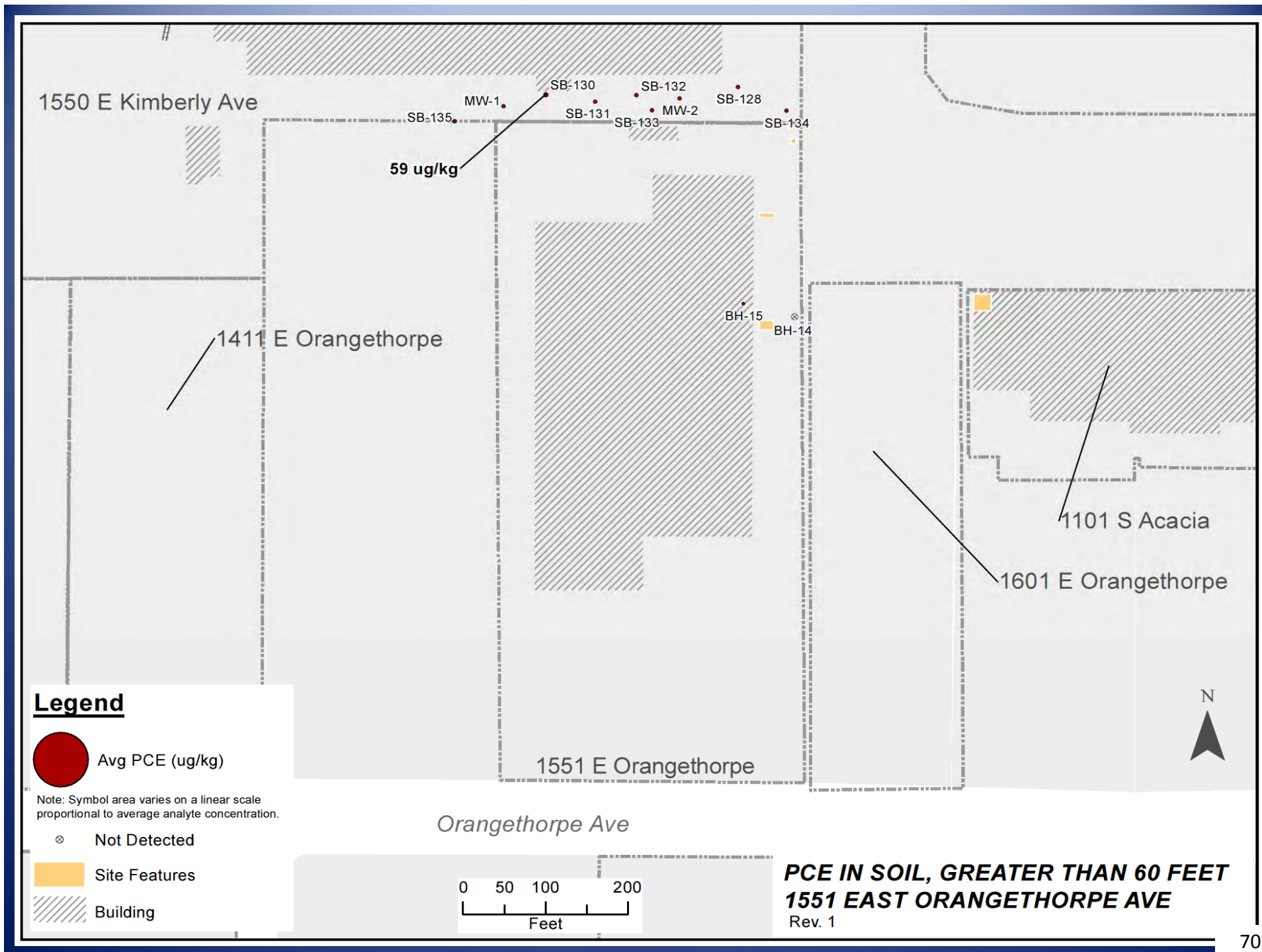




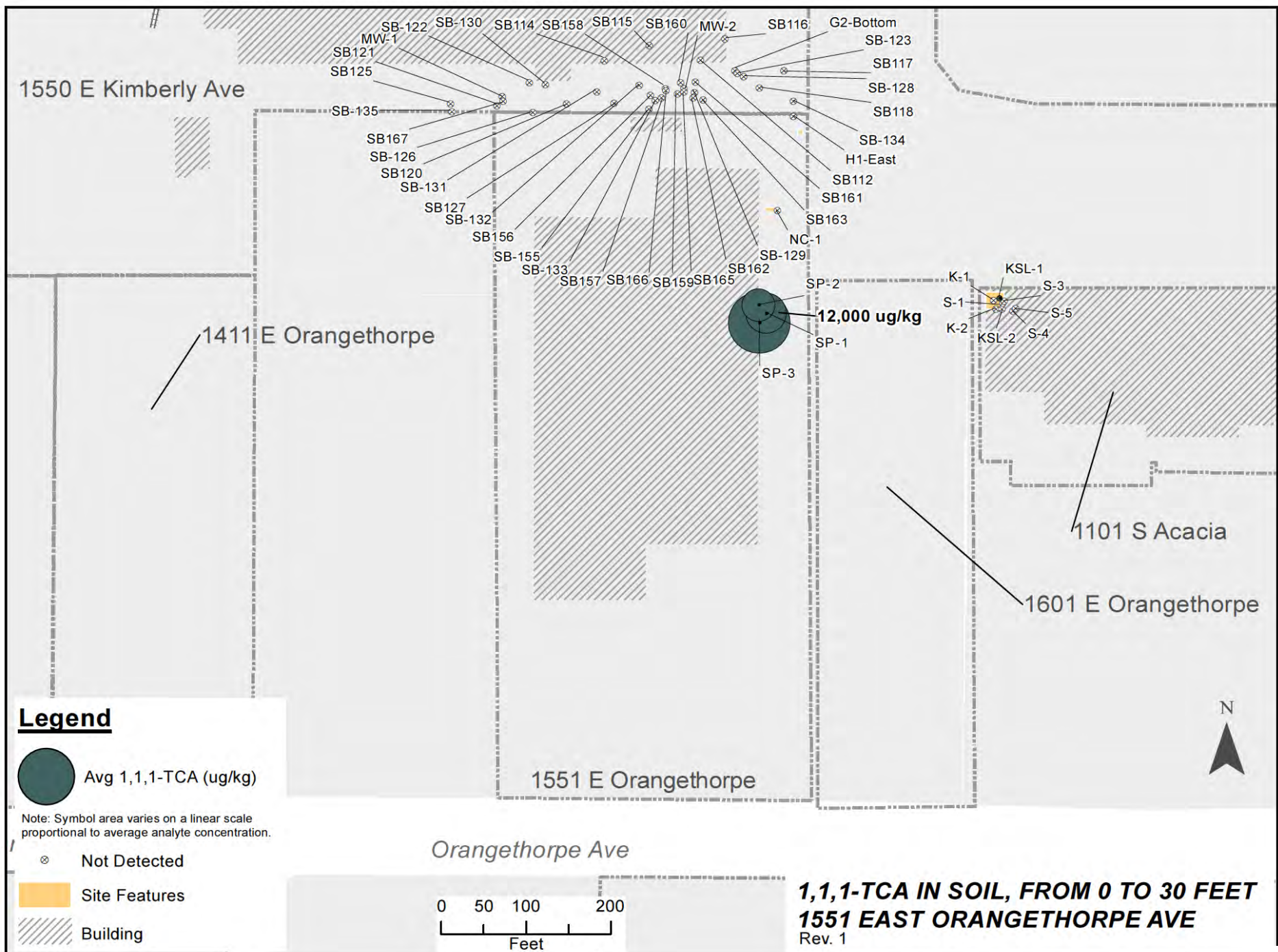




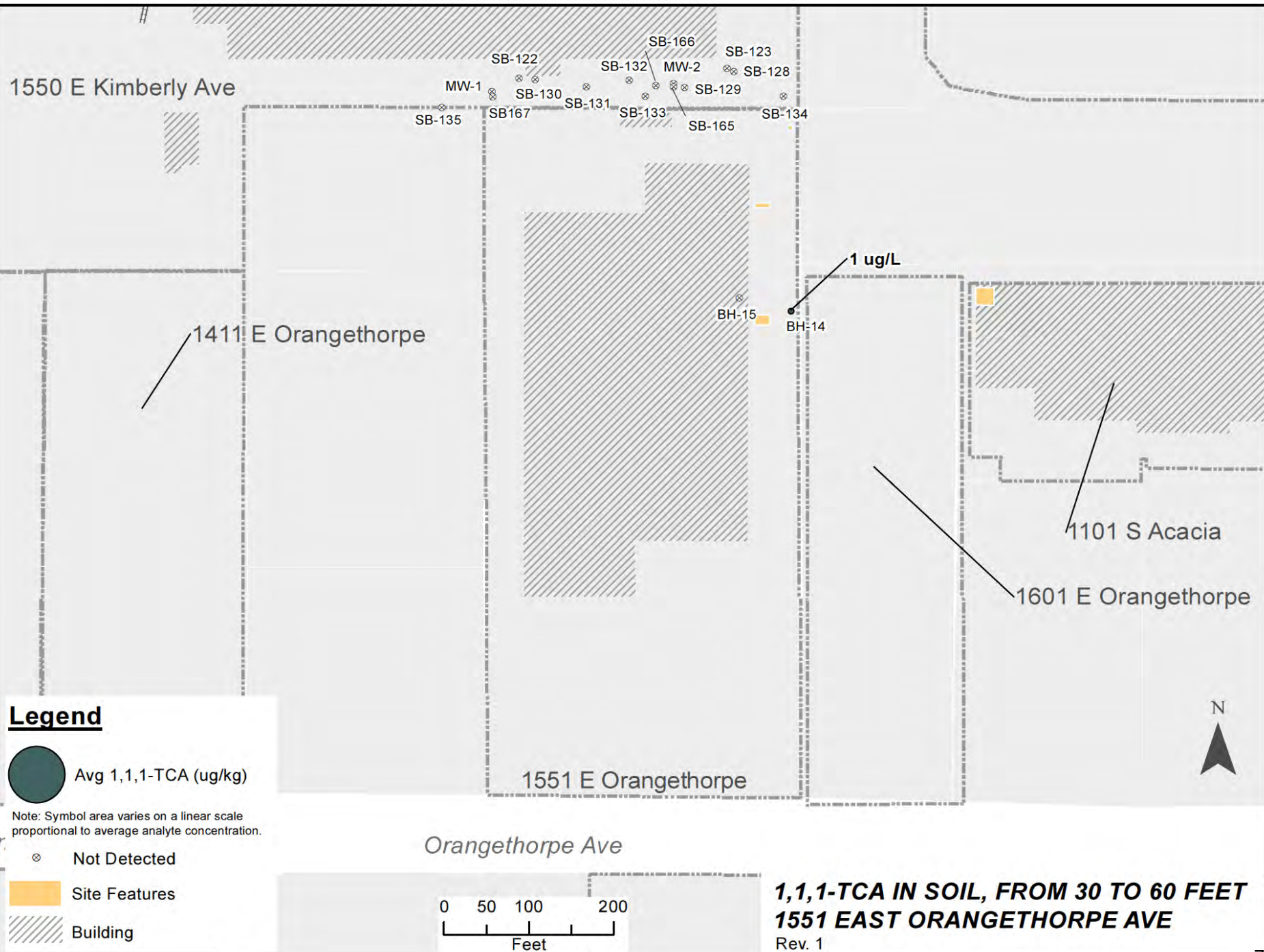












1550 E Kimberly Ave

1411 E Orangethorpe

1101 S Acacia

1601 E Orangethorpe

1551 E Orangethorpe

Orangethorpe Ave

### Legend



Avg 1,1,1-TCA (ug/kg)

Note: Symbol area varies on a linear scale proportional to average analyte concentration.



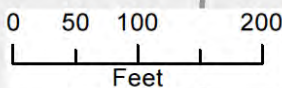
Not Detected



Site Features



Building

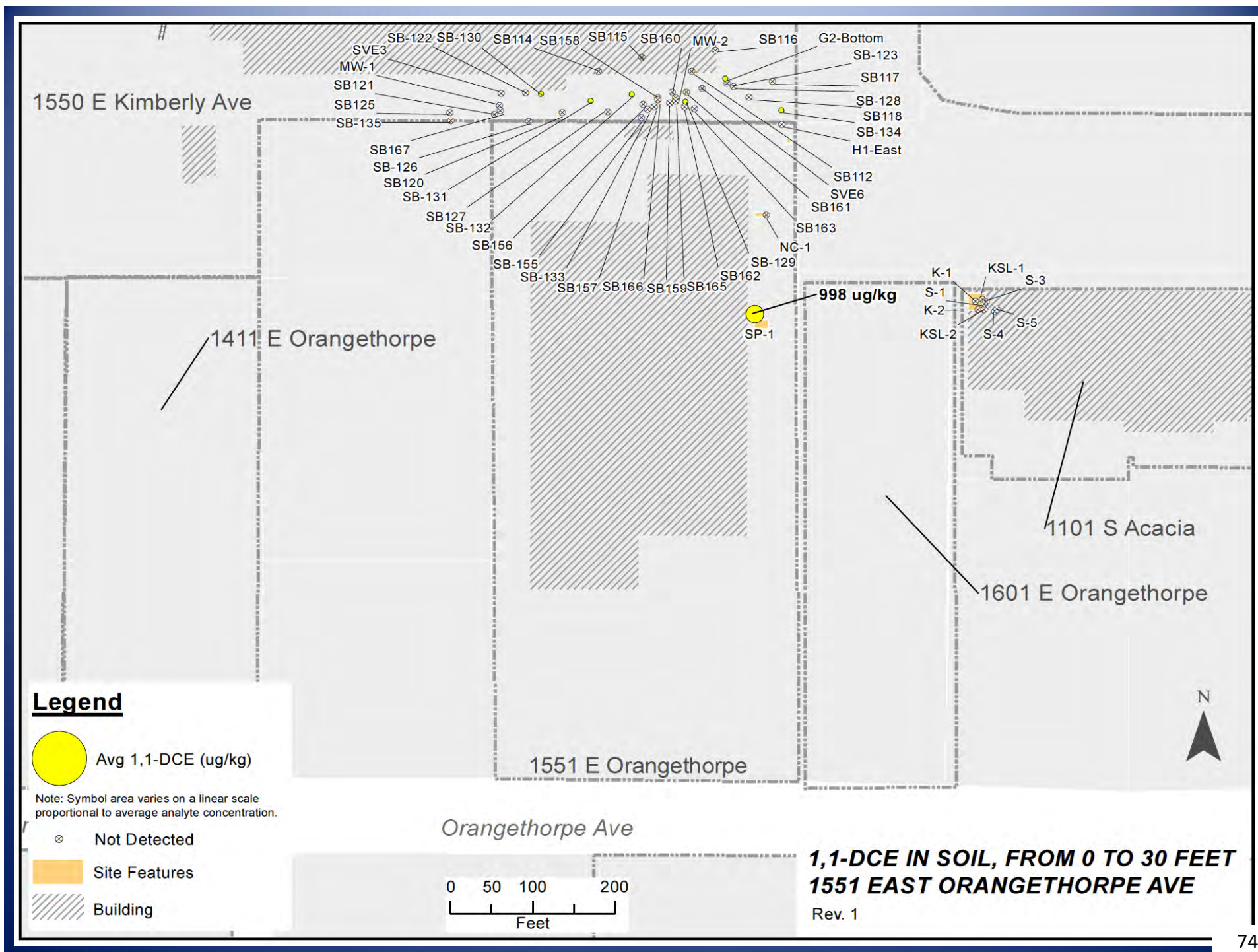


**1,1,1-TCA IN SOIL, GREATER THAN 60 FEET  
1551 EAST ORANGETHORPE AVE**

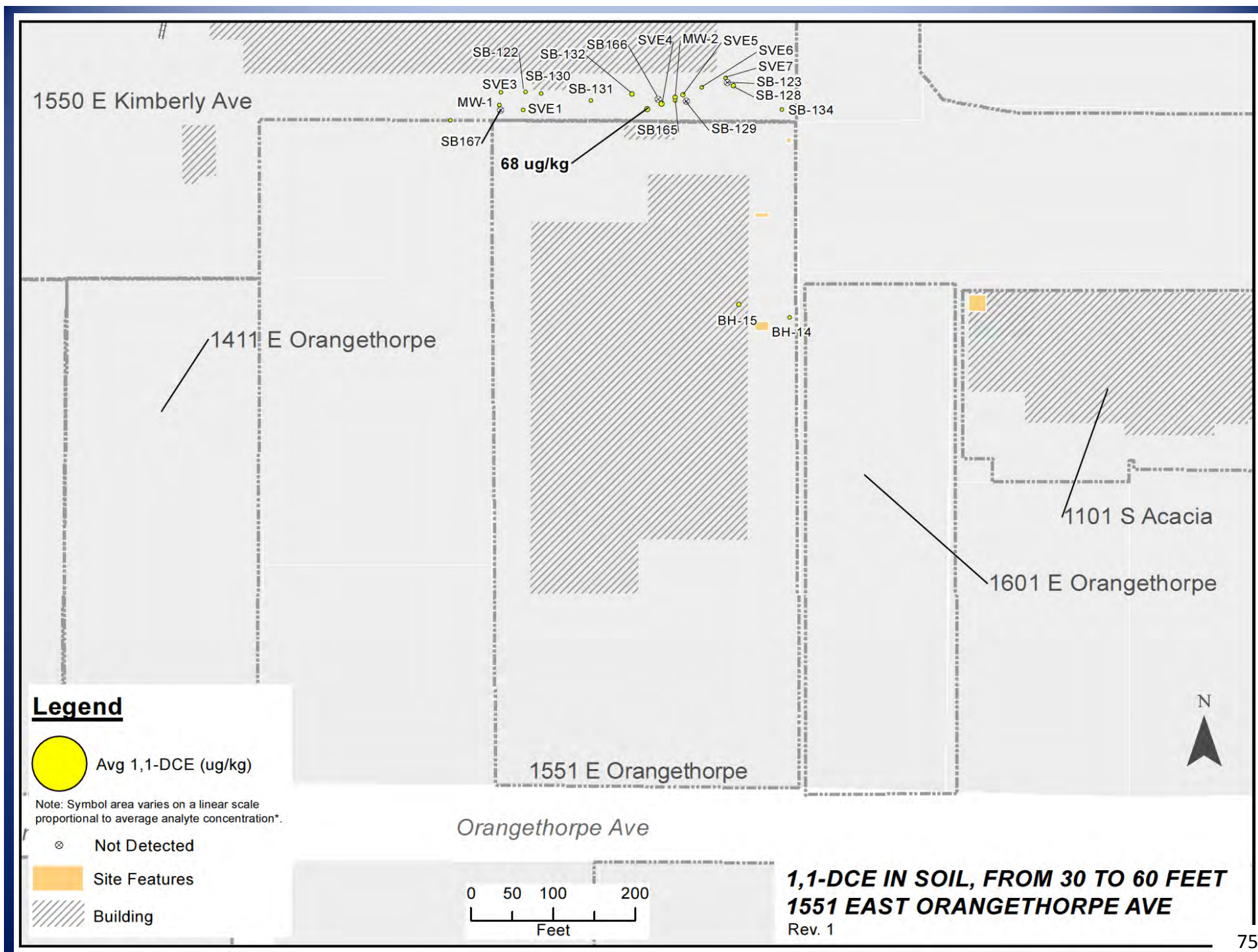
Rev. 1











1550 E Kimberly Ave

1411 E Orangethorpe

SB-135 MW-1 SB-130 SB-131 SB-132 MW-2 SB-128 SB-133 SB-134

23.6 ug/kg

BH-15 BH-14

1101 S Acacia

1601 E Orangethorpe

1551 E Orangethorpe

Orangethorpe Ave

### Legend



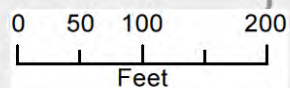
Avg 1,1-DCE (ug/kg)

Note: Symbol area varies on a linear scale proportional to average analyte concentration.

⊗ Not Detected

Site Features

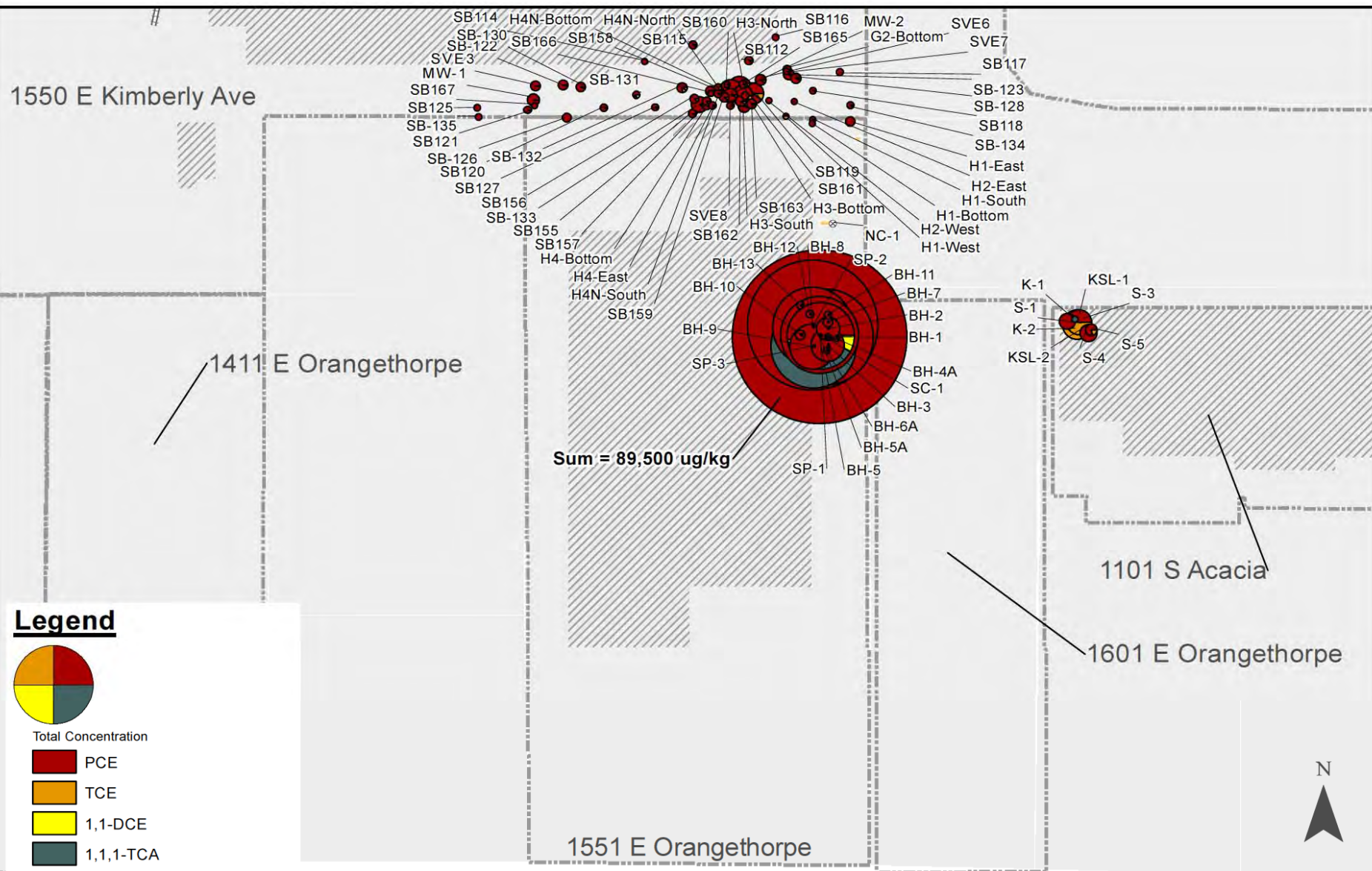
Building



**1,1-DCE IN SOIL, GREATER THAN 60 FEET  
1551 EAST ORANGETHORPE AVE**

Rev. 1

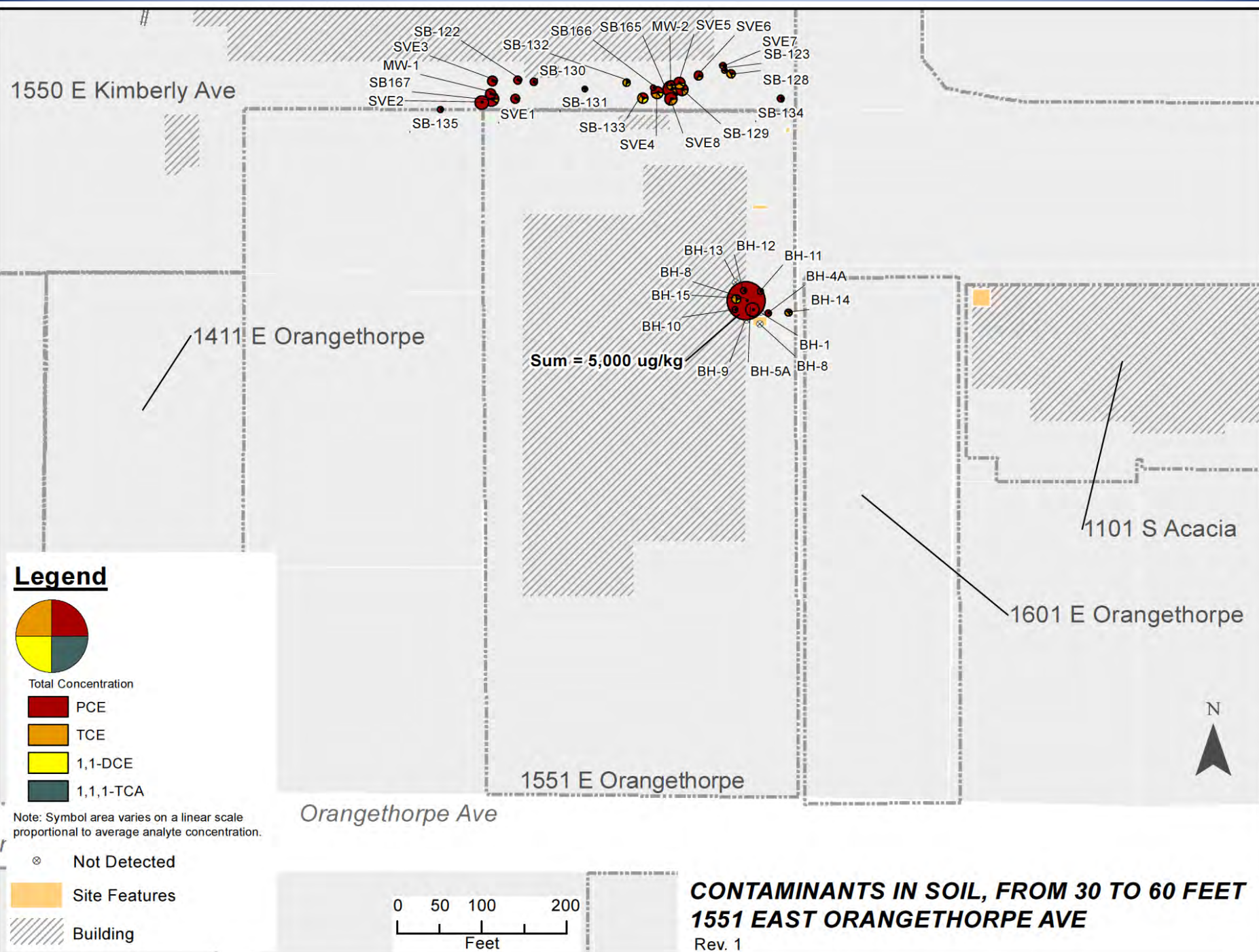




# **CONTAMINANTS IN SOIL, FROM 0 TO 30 FEET** **1551 EAST ORANGETHORPE AVE**

Rev. 1





1550 E Kimberly Ave

SB-130 SB-132 SB-128  
SB-131 MW-2 SB-133 SB-134  
SB-135 MW-1

1411 E Orangethorpe

Sum = 153 ug/kg

BH-15 BH-14

1101 S Acacia

1601 E Orangethorpe

1551 E Orangethorpe

### Legend



Total Concentration

- PCE
- TCE
- 1,1-DCE
- 1,1,1-TCA

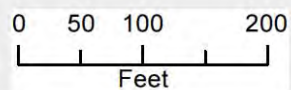
Note: Symbol area varies on a linear scale proportional to average analyte concentration.

⊗ Not Detected

Site Features

Building

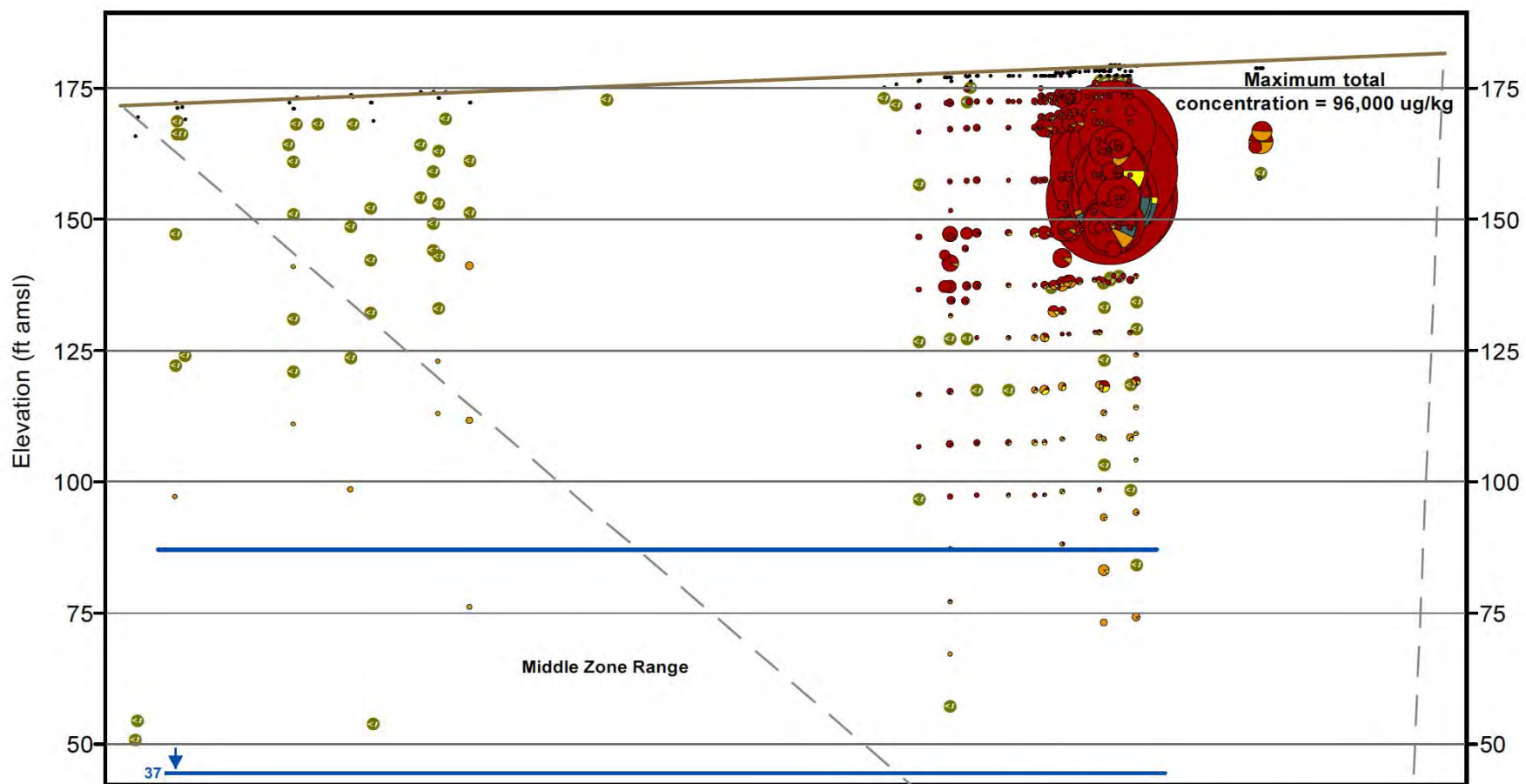
Orangethorpe Ave



**CONTAMINANTS IN SOIL, GREATER THAN 60 FEET**  
**1551 EAST ORANGETHORPE AVE**  
Rev. 1







#### Legend

Non-Detect



PCE

TCE

TCA

DCE

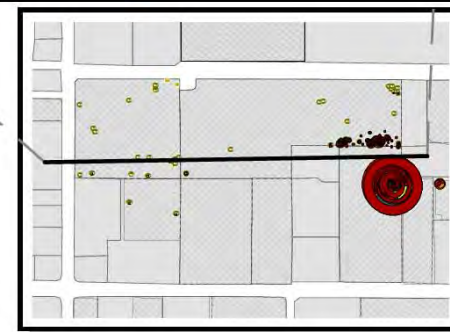


Figure 4.2-1 Vertical Distribution of Contaminants in Soil Samples

Rev. 1

1551 East Orangethorpe

(Vertical Exaggeration: 10x)



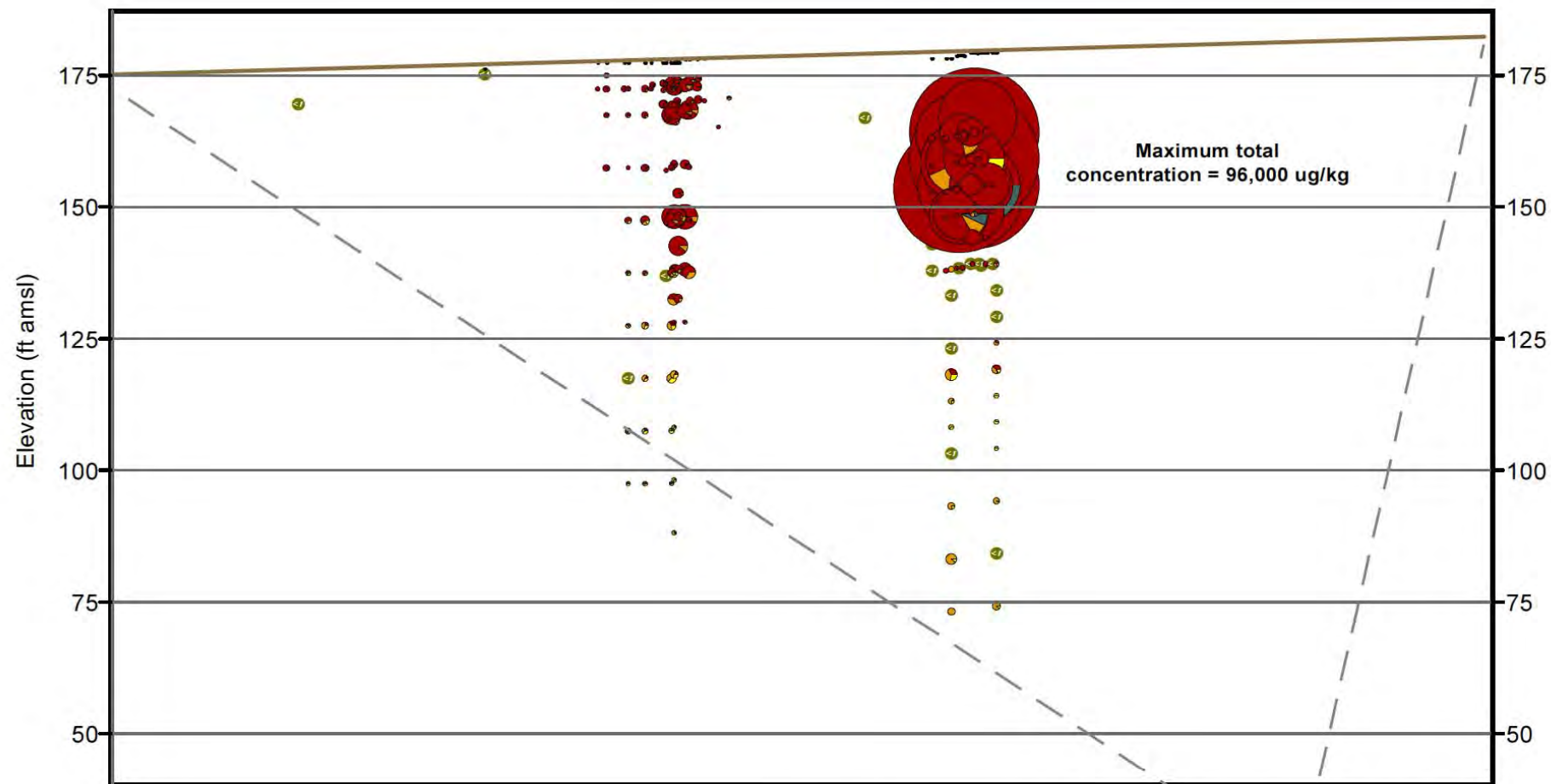


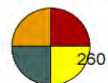
Figure 4.2-2 Vertical Distribution of Contaminants in Soil Samples

1551 East Orangethorpe

(Vertical Exaggeration: 5X)

#### Legend

Non-Detect



PCE

TCE

TCA

DCE



# Summary of Soil Data

- Limited soil sampling has been performed
- PCE (96,000 ppb), TCE (3,400 ppb), and 1,1,1-TCA (19,600 ppb) were measured near the southern degreaser
- TCE was detected at a depth of 105 feet (160 and 180 ppb)
- Concentrations were many-fold higher than measured on nearby properties

# Soil Gas





1550 E Kimberly Ave

1411 E Orangethorpe

NO-9A

NO-1

NO-8

NO-7

NO-6

### Legend



Avg PCE (ug/L)

Note: Symbol area varies on a linear scale proportional to average analyte concentration.



Not Detected

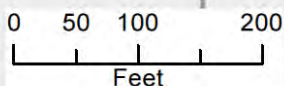


Site Features



Building

Orangethorpe Ave



SG-370

1551 E Orangethorpe

SG84 SG113 SG116

SG77

SG106

SG122

SG120

SG121

SG126

SV35

SV43B

VEW3

SV-12

VEW3B

SV36

SV34

VEW17

VEW7

VEW6

SV33

SV-23

VEW8

SV-13

SV41

SV32

VEW11

VEW9

SV-14

SV-17

VEW13

SV40

SV-15

VEW13

SV-16

SV-8

VEW14

SG114

SG127

SV44

SV42

SV36B

SV36

SV34

VEW17

VEW7

VEW6

SV33

SV-23

VEW8

SV-13

SV41

SV32

VEW11

VEW9

SV-14

SV-17

VEW13

SV40

SV-15

VEW13

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SV-8

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VEW14

SG114

SG127

SV44

SV42

SV36B

SV36

SV34

VEW17

VEW7

VEW6

SV33

SV-23

VEW8

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SV40

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SV-16

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SV-8

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SV-16

SV-8

VEW14

SG114

SG127

SV44

SV42

SV36B

SV36

SV34

VEW17

VEW7

VEW6

SV33

SV-23

VEW8

SV-13

SV41

SV32

VEW11

VEW9

SV-14

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SV40

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VEW14

SG114

SG127

SV44

SV42

SV36B

SV36

SV34

VEW17

VEW7

VEW6

SV33

SV-23

VEW8

SV-13

SV41

SV32

VEW11

VEW9

SV-14

SV-17

VEW13

SV40

SV-15

VEW13

SV-16

SV-8

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SV-16

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SG114

SG127

SV44

SV42

SV36B

SV36

SV34

VEW17

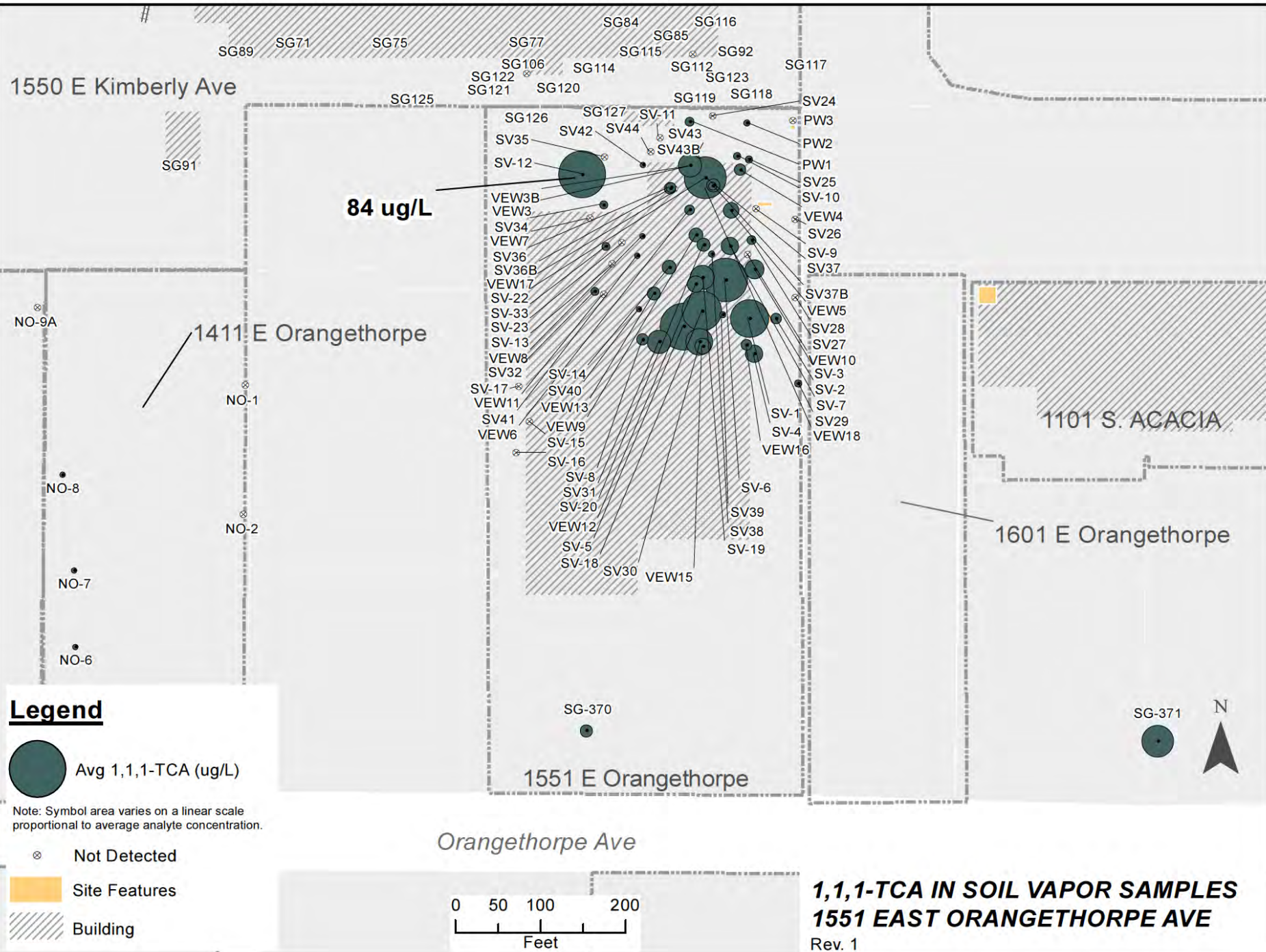
VEW7

VEW6

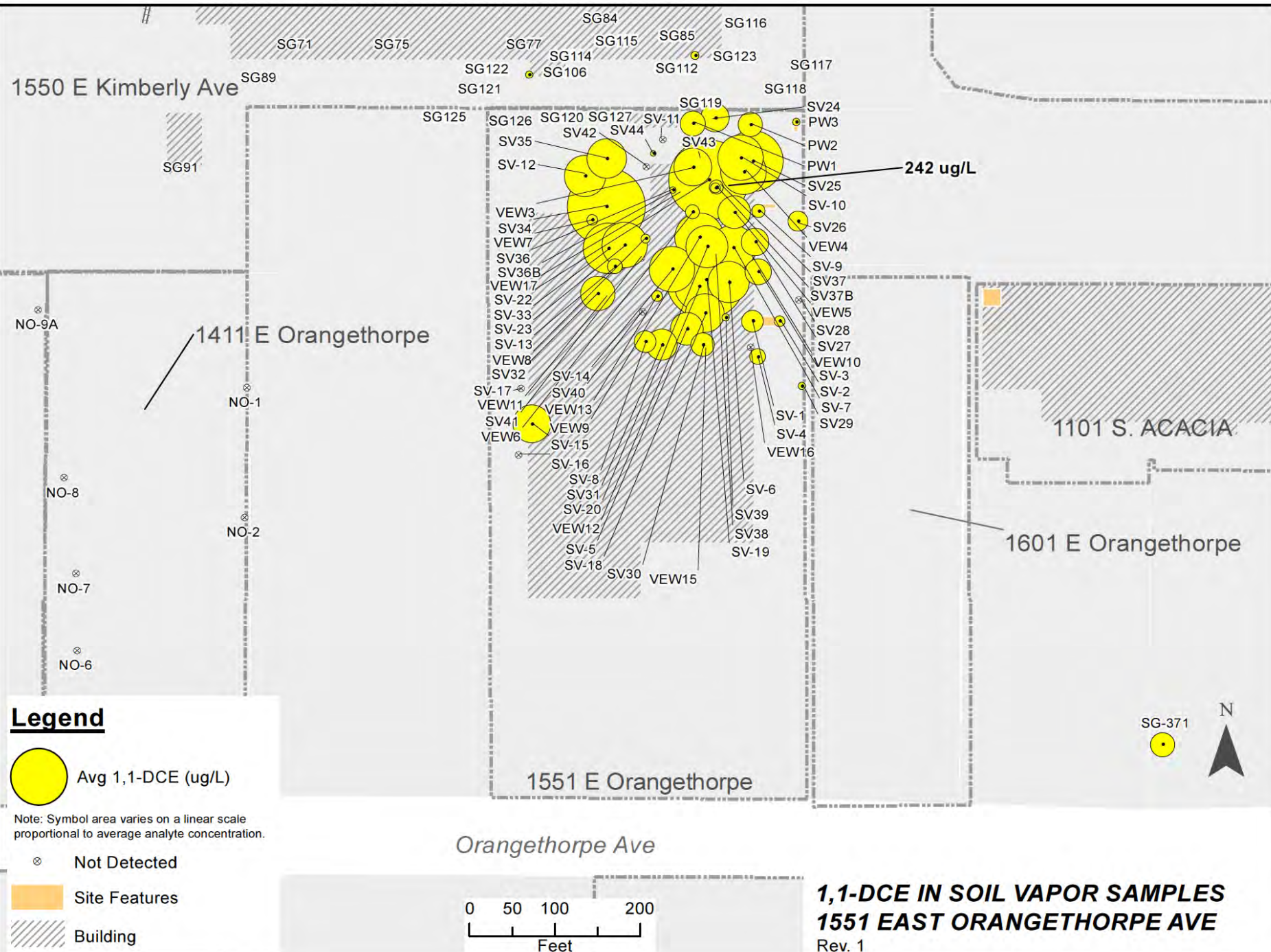
SV33

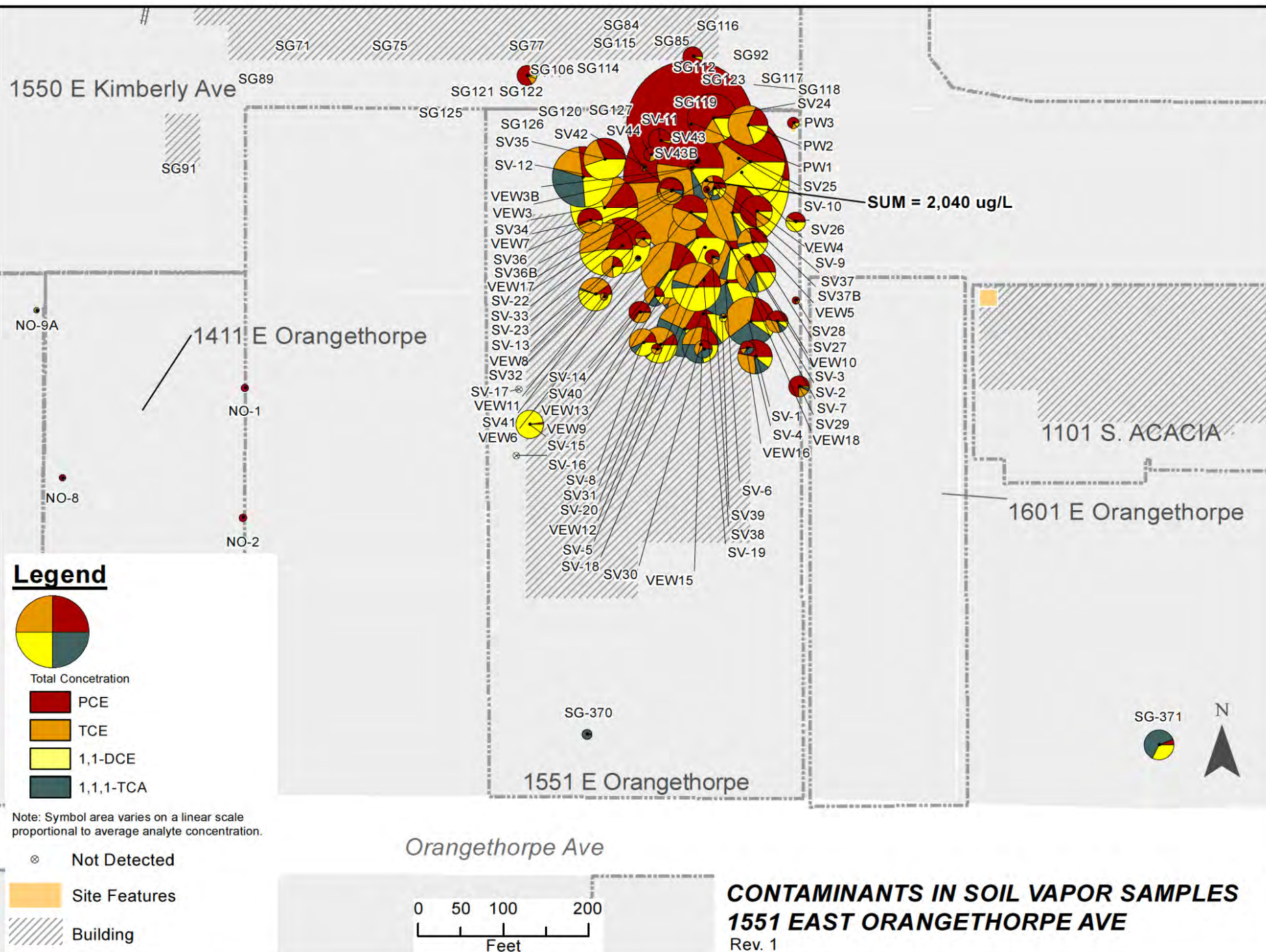
SV-23











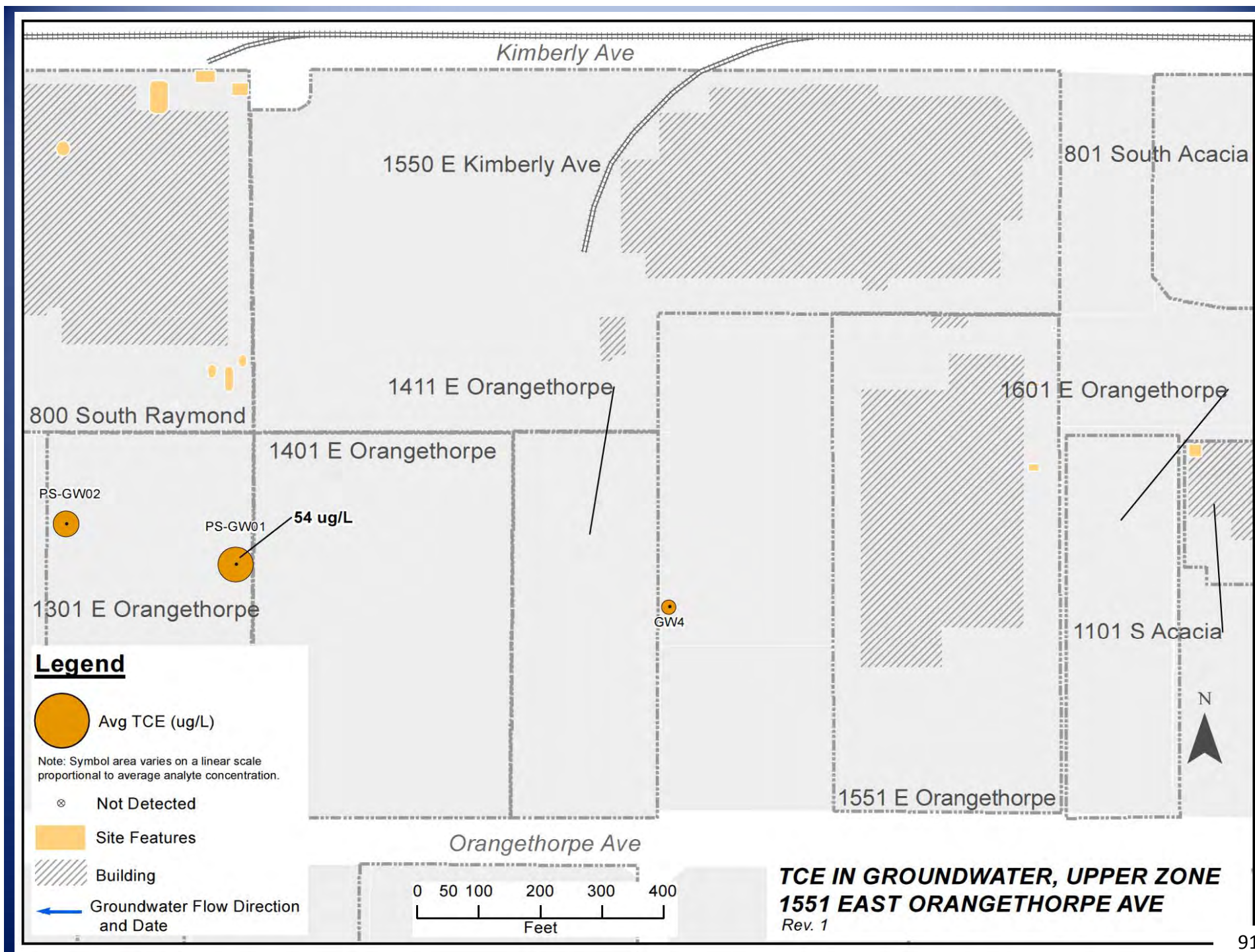


# Summary of Soil Gas Data

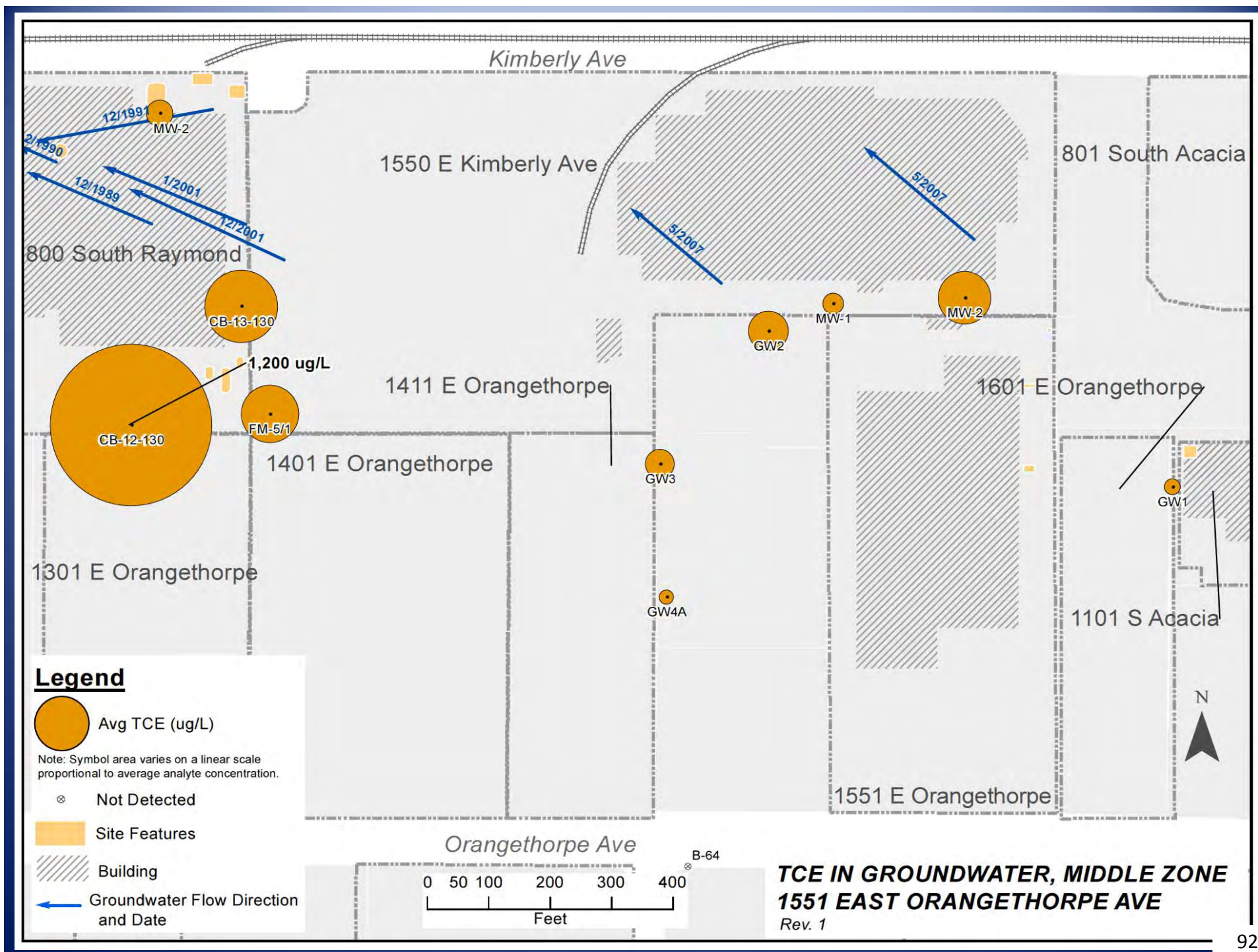
- TCE (710 ug/L), PCE (4,200 ug/L), 1,1,1-TCA (83 ug/L), and 1,1-DCE (460 ug/L) were detected
- Samples were collected beneath the building where TCE, PCE, and 1,1,1-TCA were used
- Concentrations are many-fold higher than on the Johnson Controls site [data are unavailable on the other nearby sites]



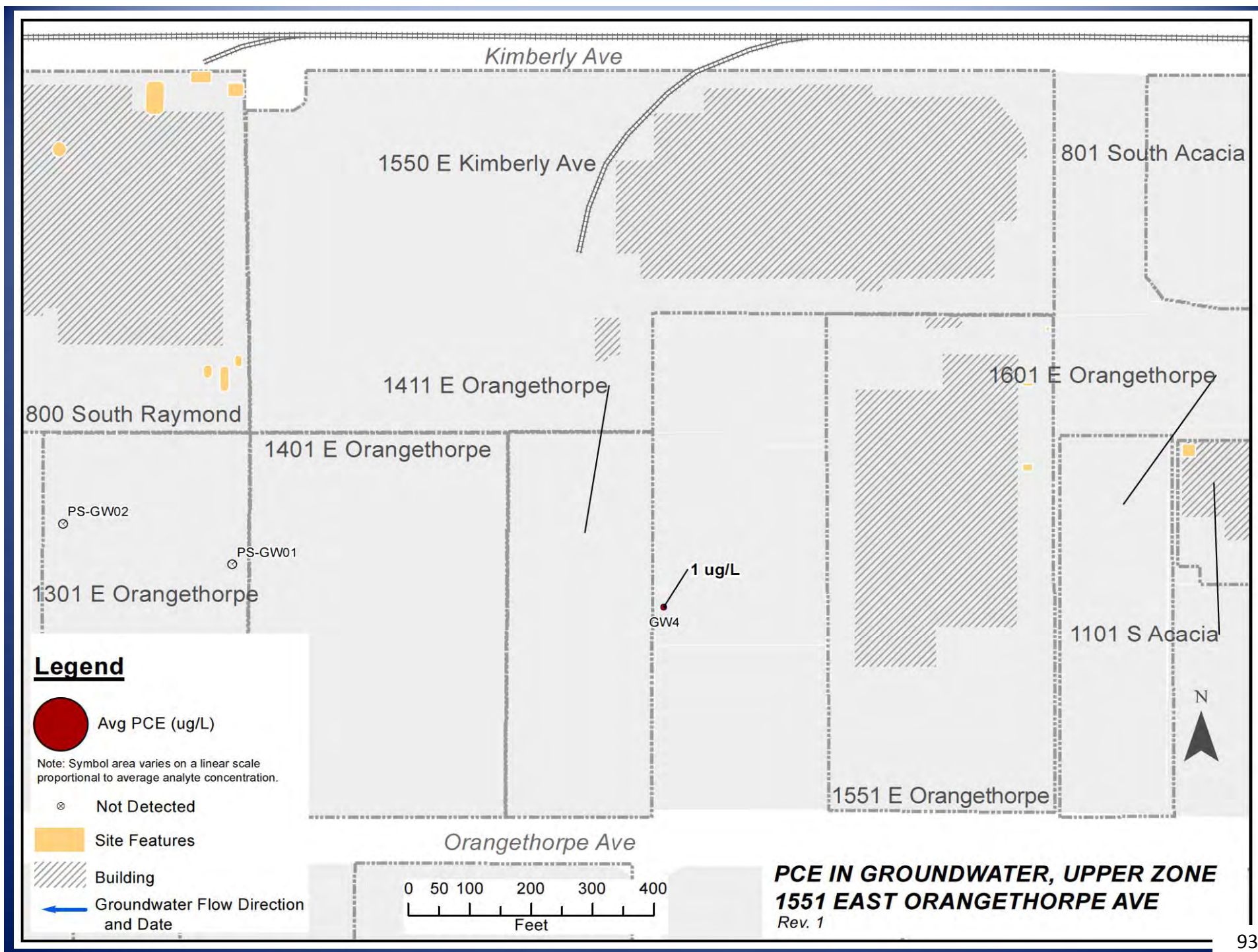
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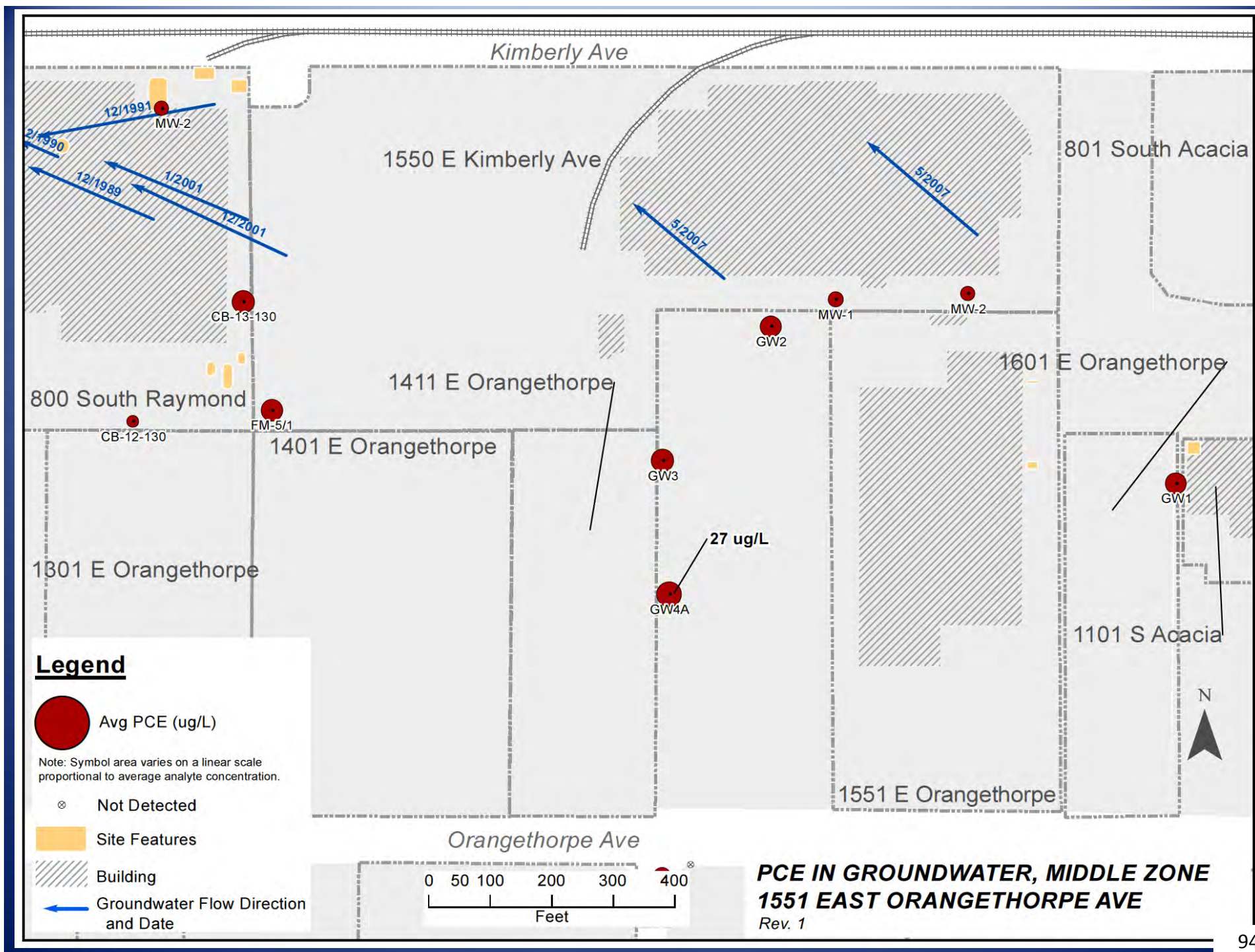




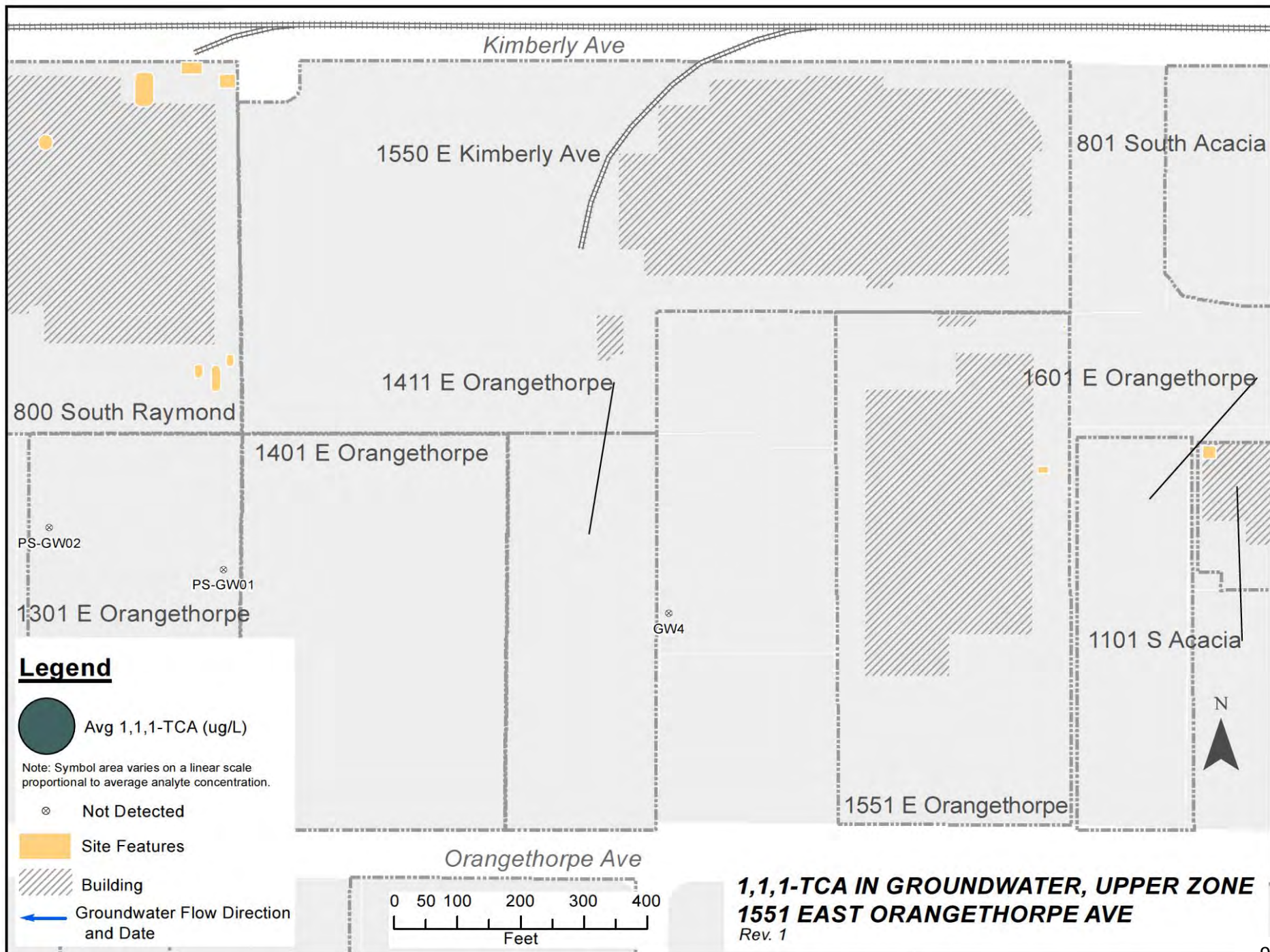




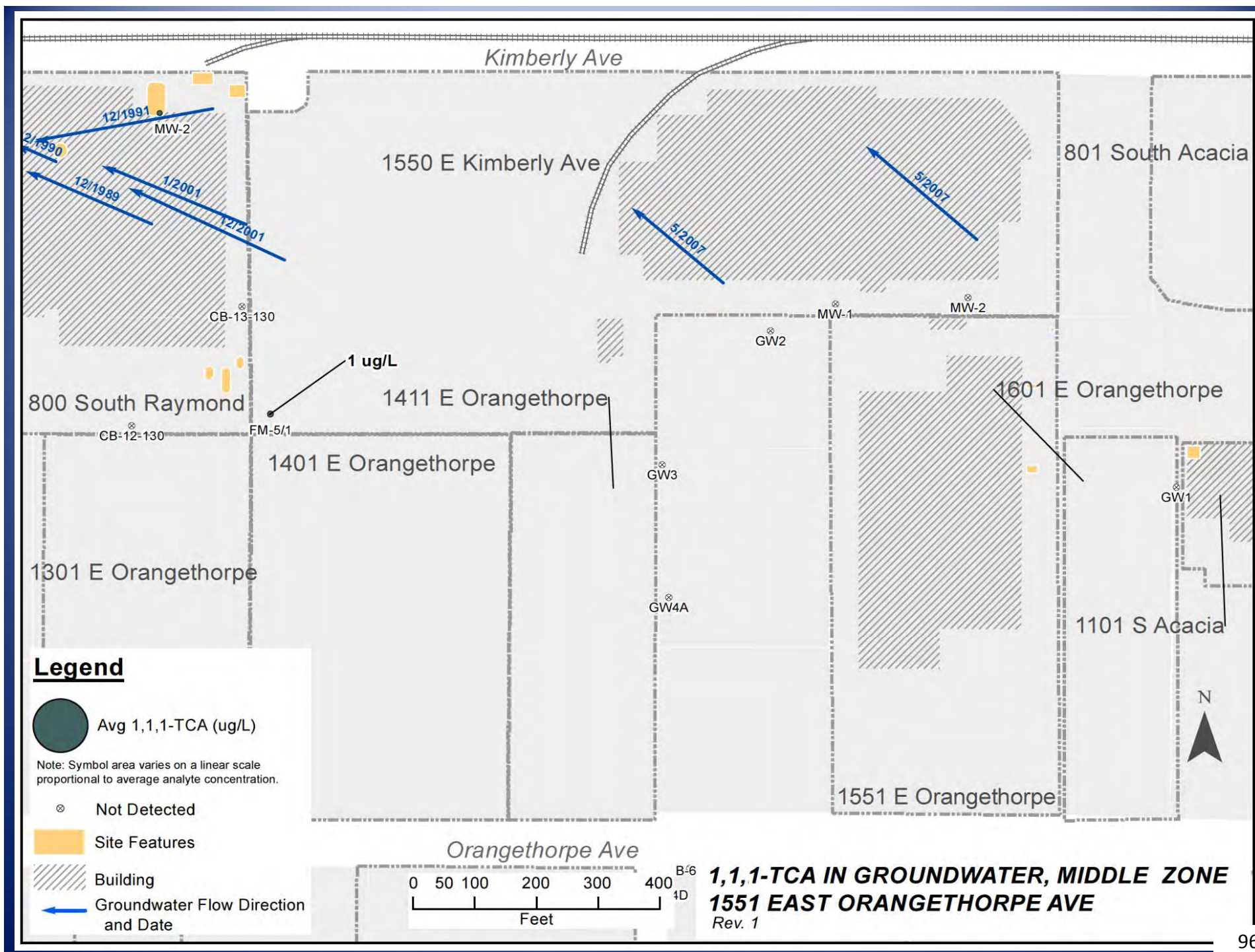


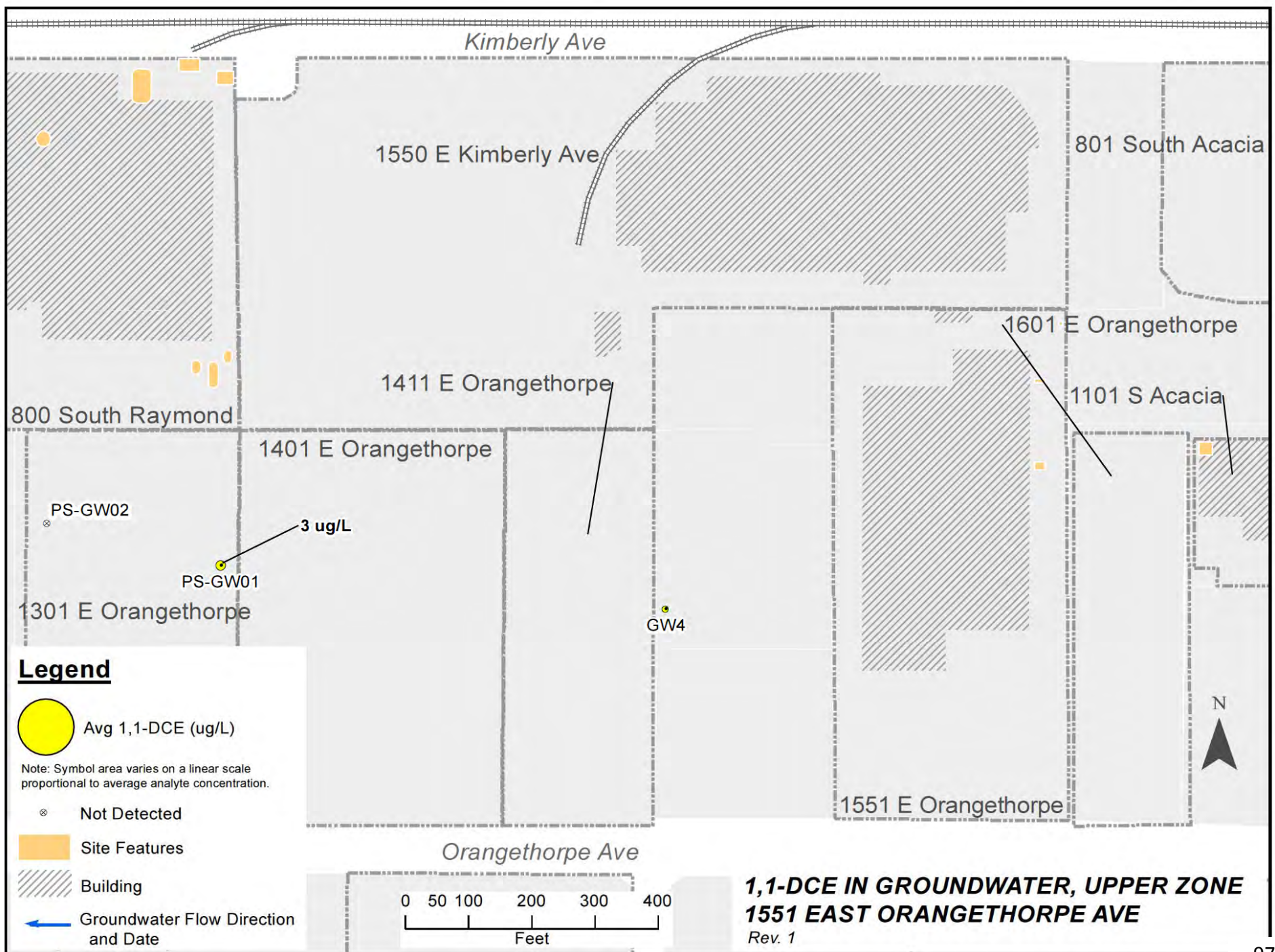




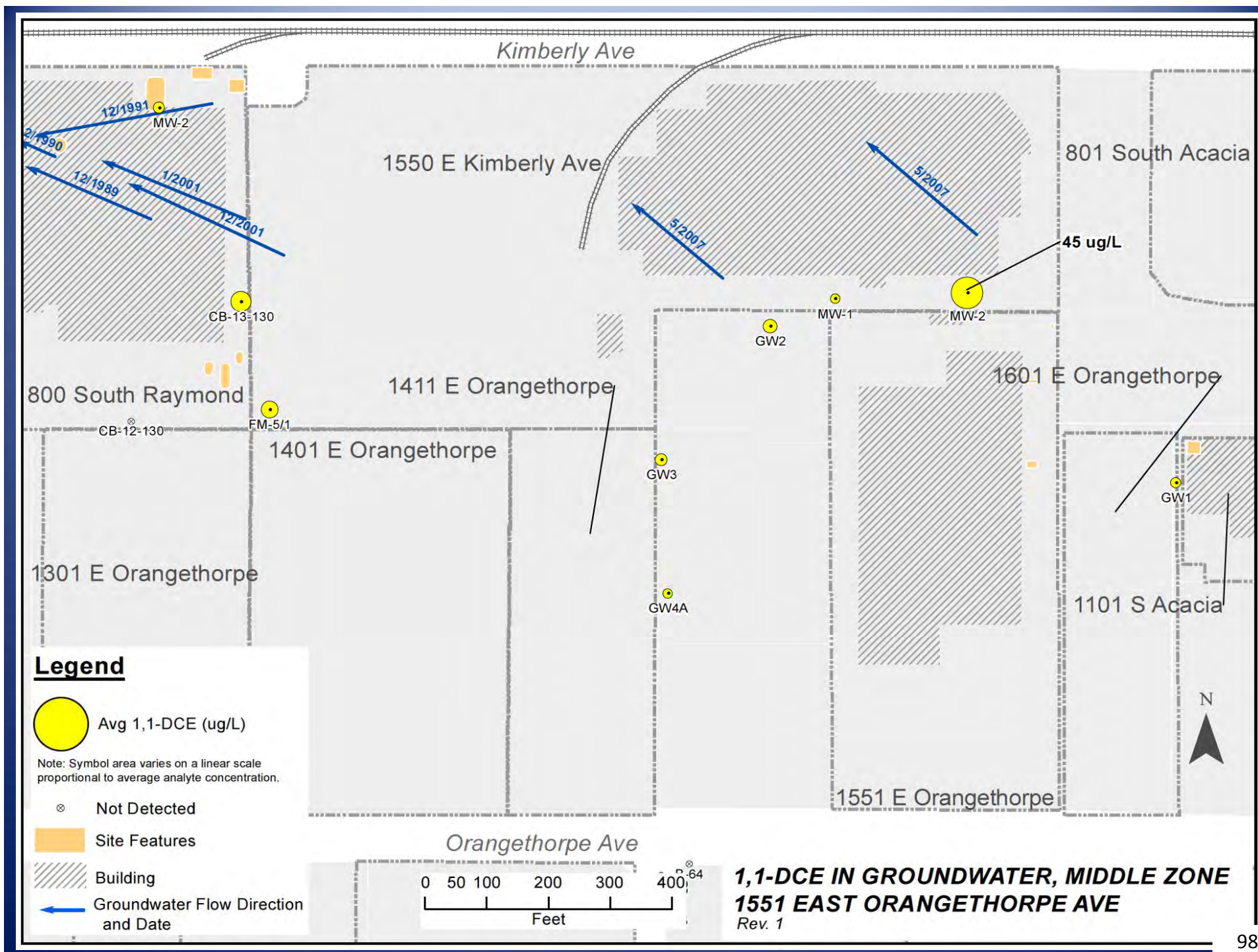




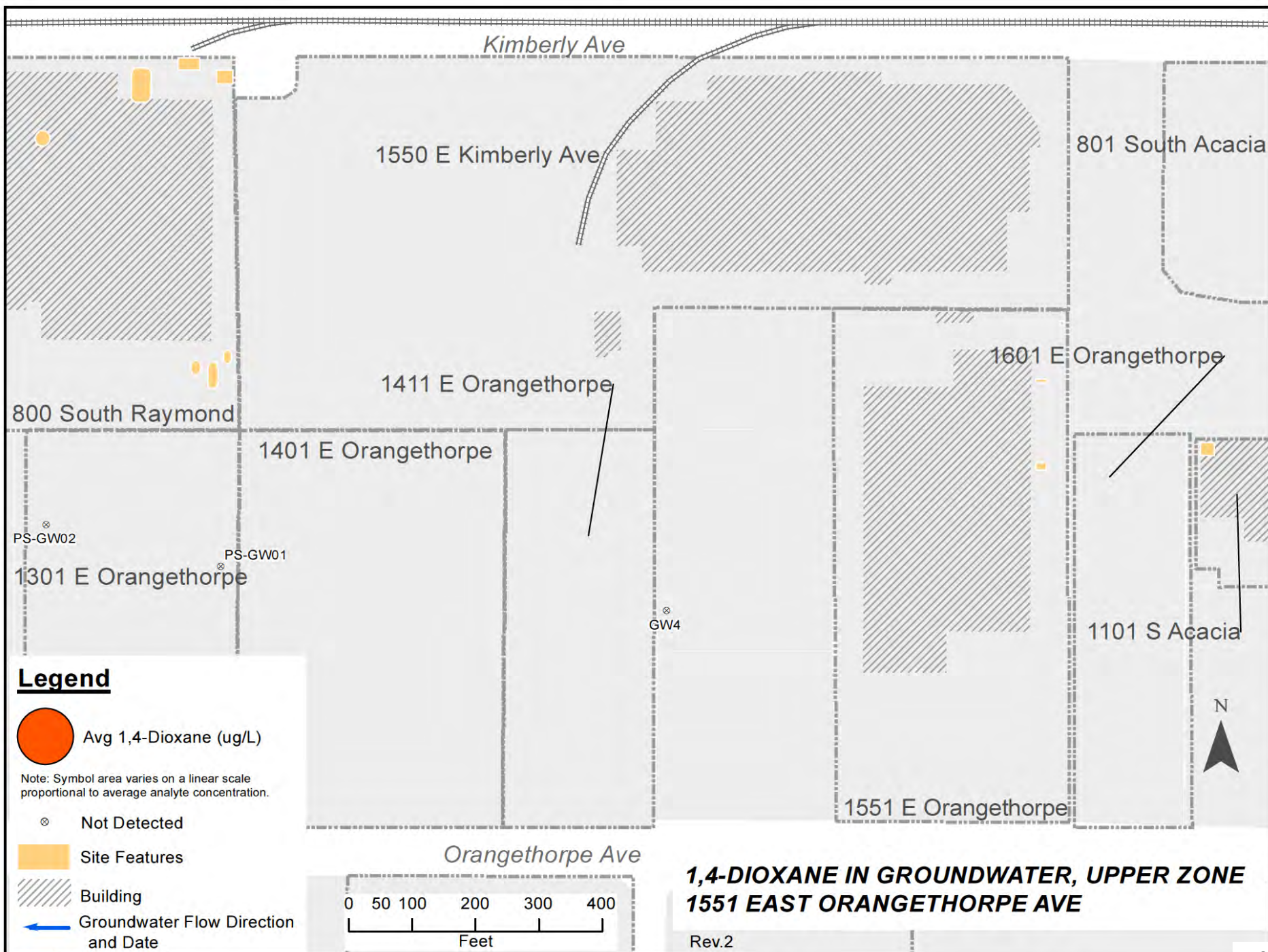




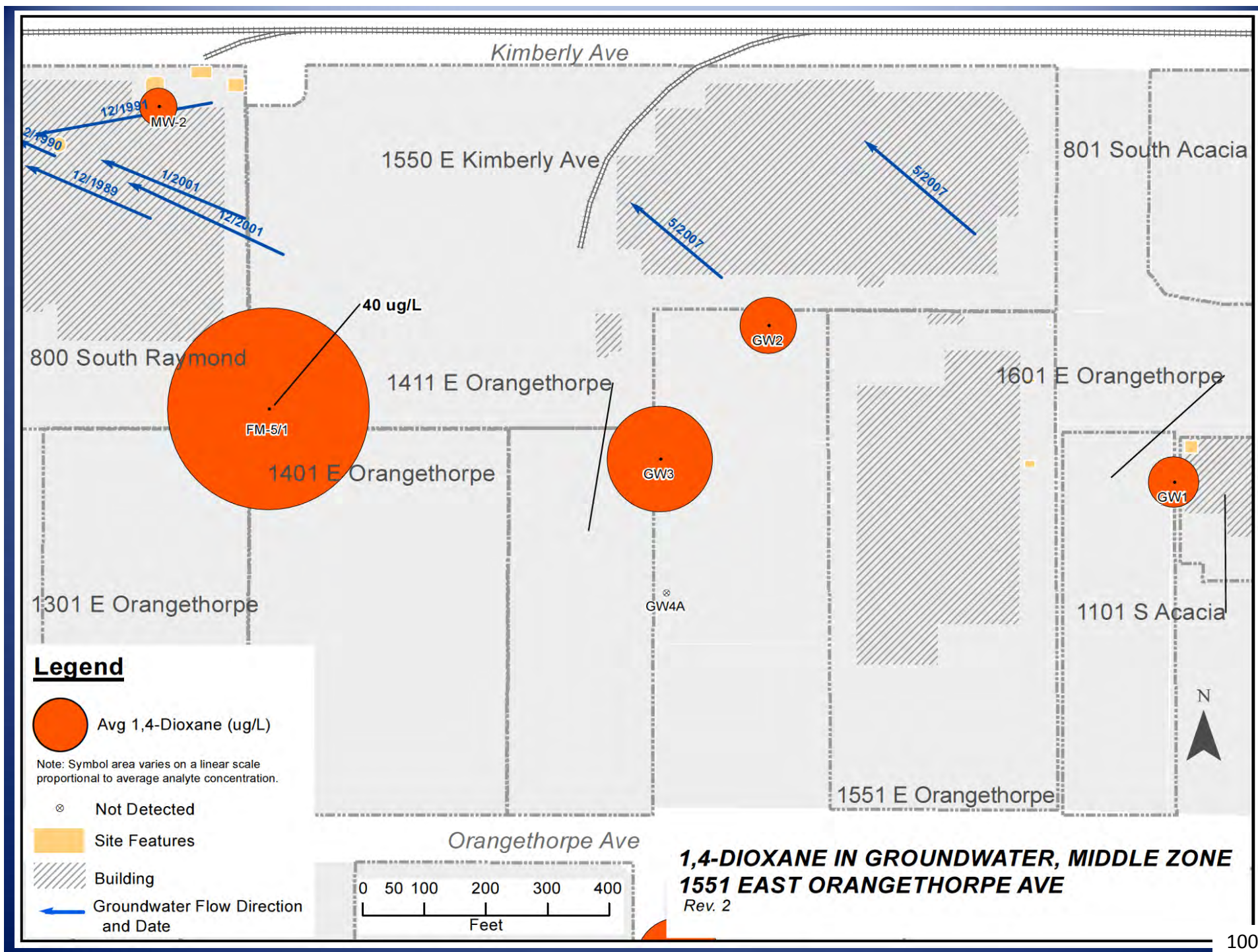




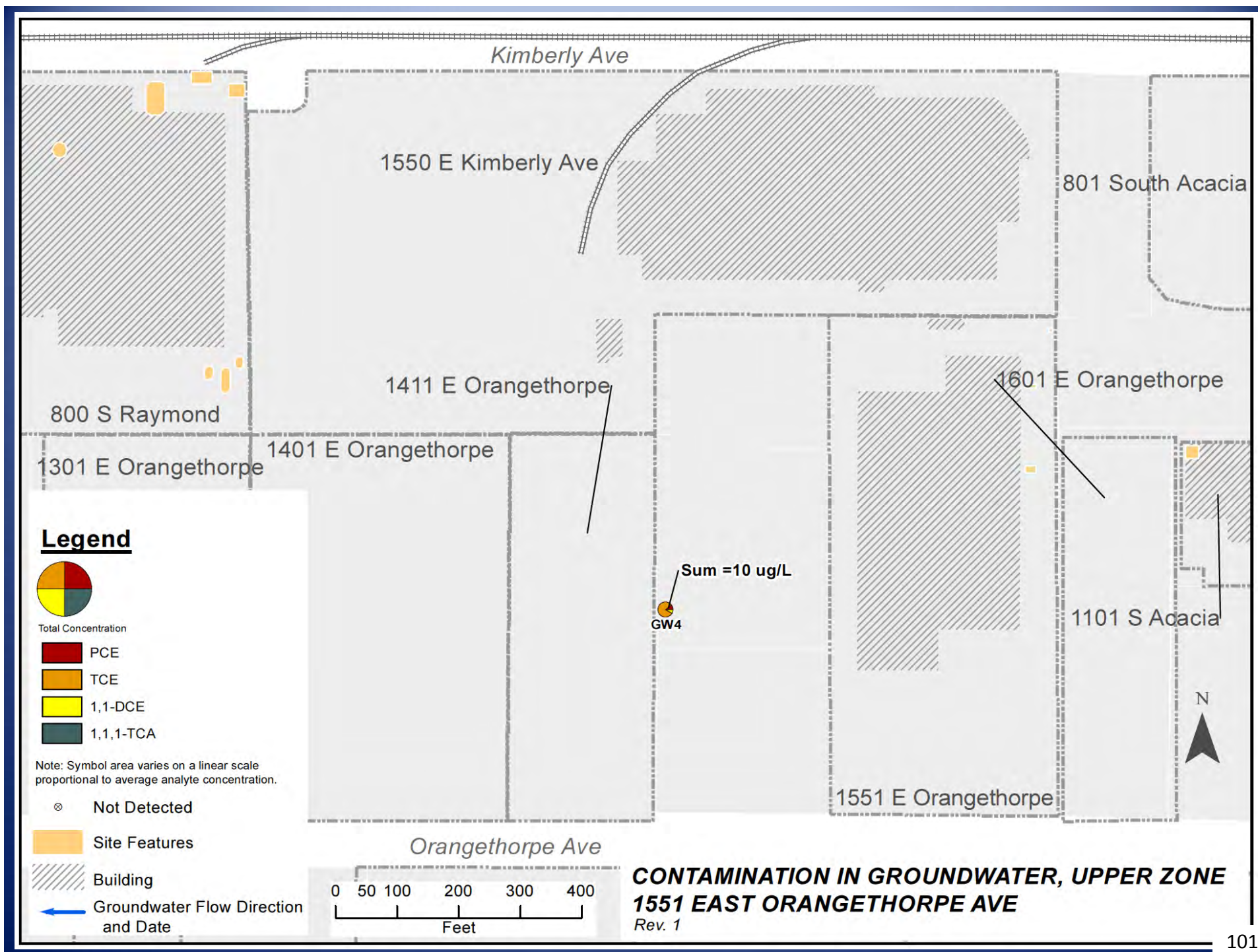




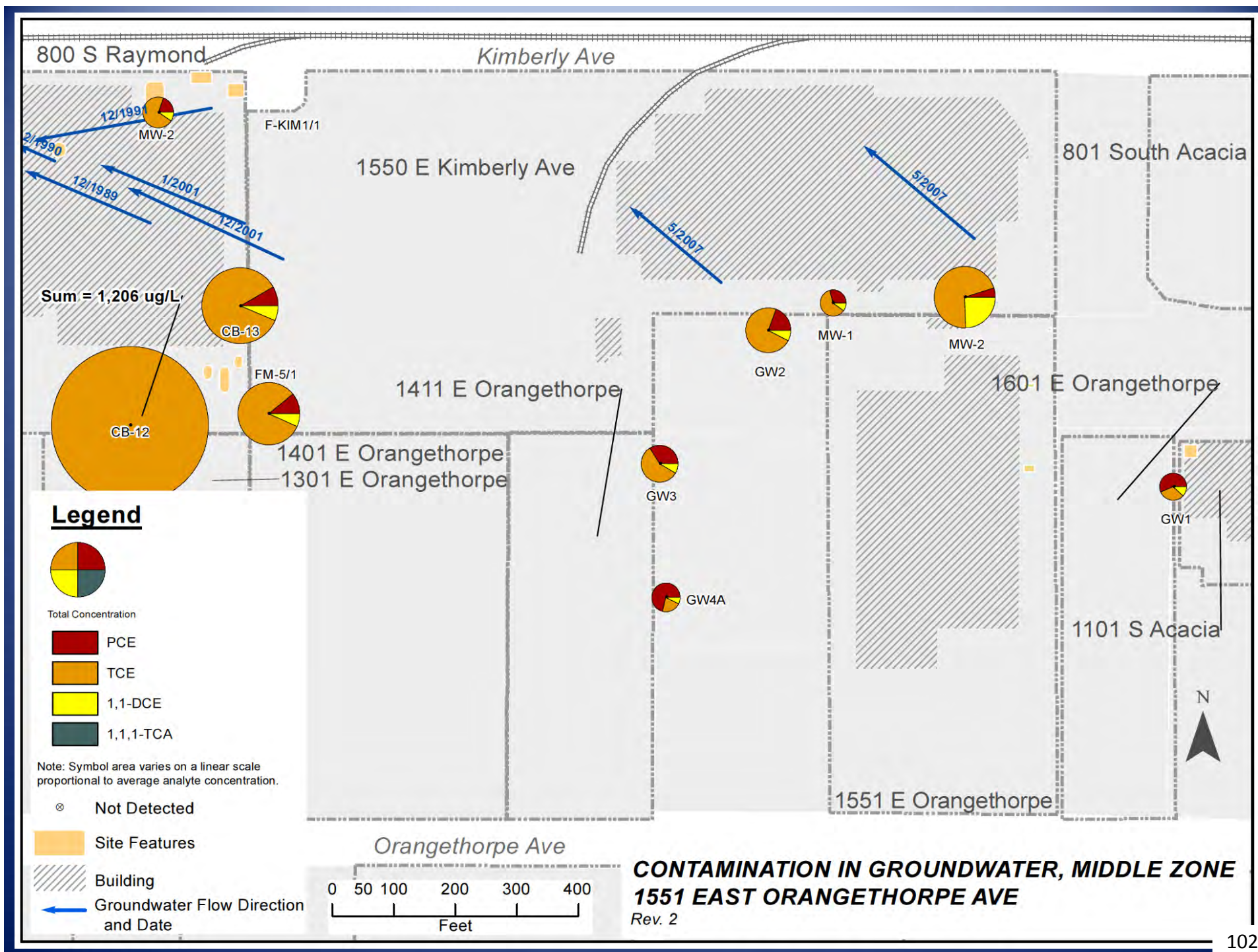




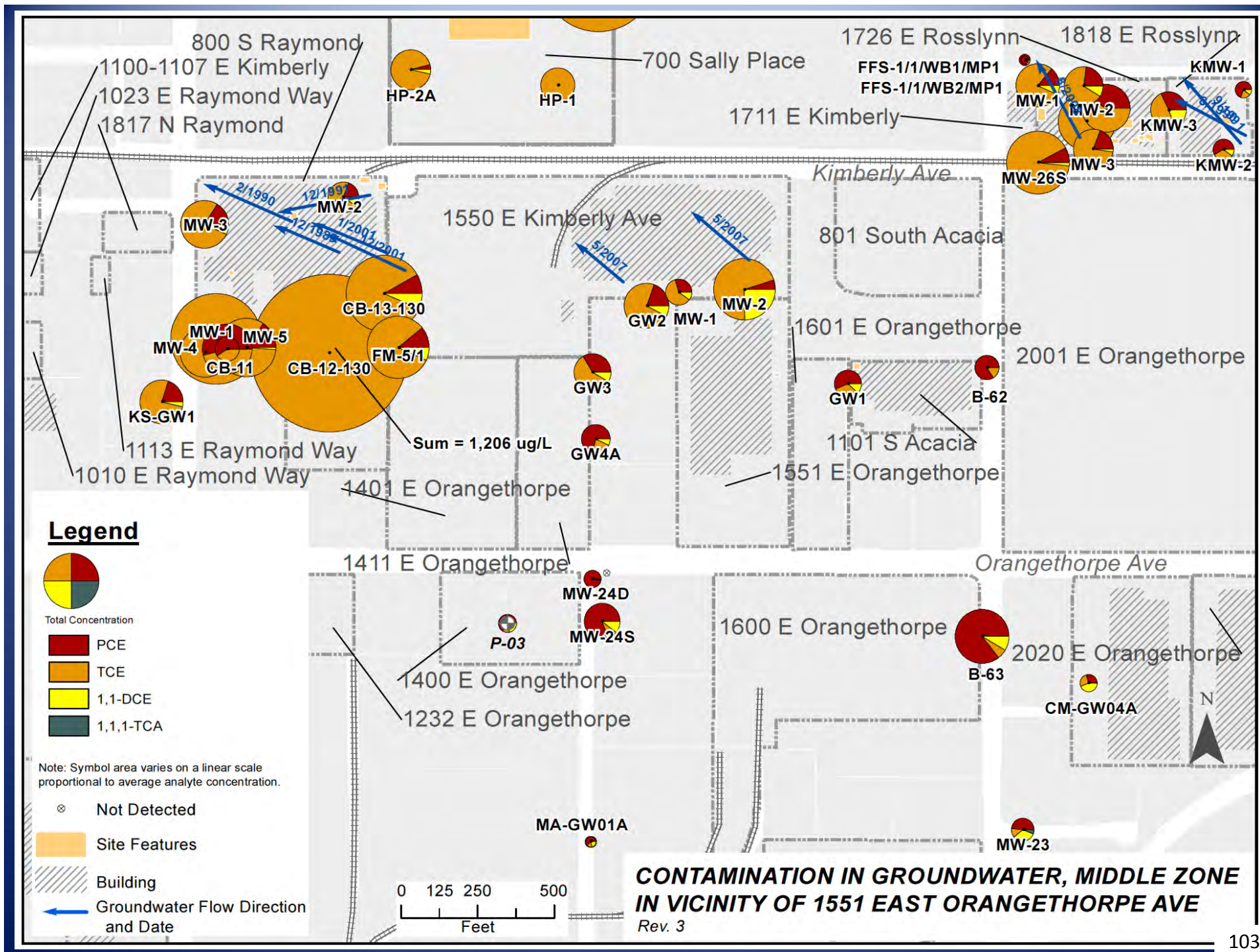












# Summary of Groundwater Data

- GW-1 shows groundwater quality near the Jonathan Manufacturing release
- JCI MW-2 and GW-2 are downgradient of release areas at Arnold Engineering



# Summary of Groundwater Data

- JCI MW-2 and GW-2 had concentrations of TCE and 1,1-DCE many times greater than GW-1
- Because 1,4-dioxane was not measured in JCI wells, the impact of the Arnold Engineering site is not clearly indicated, but it is likely that 1,4-dioxane from the site has impacted groundwater

# Remediation

- The northern and southern clarifiers were removed in 1994
- SVE was conducted at the southern clarifier in 1995 for approximately 3 months
- SVE is being conducted to a depth of 60 feet beneath the northern part of the building (since 2008), but has removed less than 100 pounds
- No remediation of groundwater has occurred

# Summary of Opinion

- Arnold Engineering and its successor company, Integrated Specialties, occupied the site from 1960-1988
- Performed etching of metal for the electronics industry
- Process involved cutting metal parts, cleaning, coating with a photoresist mask, degreasing, coating, baking/hardening, etching, and stripping
- Chemical use included chlorinated solvents, caustics, water rinses and chlorine



# Summary of Opinion

- Chlorinated solvents were used from approximately 1961 to 1988 for degreasing and stripping
- Chlorinated solvents were dripped and spilled in the degreasing and stripping rooms onto uncoated floors and was rinsed into sewers
- Metal sheets that had been exposed to the solvents were rinsed and wastewater drained into sewers

# Summary of Opinion

- 1994 and 1995 – PCE, TCE, 1,1,1-TCA and 1,1-DCE were found in soil beneath southern clarifier
- 2007 – PCE, TCE, 1,1,1-TCA, and 1,1-DCE were found in soil gas beneath the building

# Summary of Opinion

- Concentrations of TCE, and 1,1-DCE are higher in downgradient wells than in upgradient GW-1
- Contaminants from the Arnold Engineering site have commingled with contaminants from upgradient sites (AC Products, Crucible, and perhaps Jonathan Manufacturing)



# Maximum Observed Concentrations

	Soil	Soil Gas	Upper Zone GW	Middle Zone GW
TCE	3,400	710.8	8.3	290.0
PCE	96,000	4,200	1.1	28.3
1,1,1-TCA	19,600	83.5	0	0
1,1-DCE	3,100	460	0.9	80.0
1,4-dioxane		0	0	11.5
Cis-1,2-DCE	0	32	0	0.8

# Summary of Opinion

- Soil contamination near the southern degreaser was partially remediated by the property owner using SVE in 1995
- Soil remediation by the property owner beneath the northern part of the building began in 2008
- There has been no remediation of the groundwater
- SVE system constructed by Red Eagle Properties to 40 feet bgs and operated from August 15-November 27 1995, but this was not sufficient to prevent the site from being a continuing source to groundwater
- SVE system operated from January 2008-present, but will not be effective at depths greater than 60 feet

# Summary

- TCE, PCE, 1,1,1-TCA, 1,1-DCE and 1,4-Dioxane have migrated downgradient from site, where they have commingled with contaminants from several other sites
  - Moore Business Forms
  - Kester Solder
  - Norhtrop's Y-12



# Summary

- COCs in the groundwater from the Arnold Engineering site will be captured by EW-3, EW-2, or EW-2A

